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ABSTRACT

A study of the education program approval process involving the Veterans Administration (VA) and the State Approving Agencies (SAAs) had the following objectives: to describe the present education program approval process; to determine time and costs associated with the education program approval process; to describe the approval process at another federal agency; and to develop models of exemplary activities for the process of education program approval. Data were gathered from Department of Veterans Benefits (DVB) management and statistical recurring reports; personal interviews with VA central office and regional office personnel, staff members of SAAs, the U.S. Department of Labor, and the U.S. Department of Education; and survey questionnaires. Among the findings of the study were the following: veteran students primarily attend institutes of higher learning; placement of SAAs in state organizations varies; funding of the SAA function is not timely; there is regional variation in education program approval workload and productivity; capability to share data electronically is not used; the optimal staff size of a SAA office is four professionals; the Department of Labor approves and registers apprenticeship programs nationwide; and the Department of Education recognizes accrediting agencies that judge the quality of an educational institution or program. (The document includes 32 data tables, 7 exhibits, 5 appendices, and an 18-item bibliography.) (CML)

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Analysis of the Education Program Approval Process: A Program Evaluation

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Associate Deputy Administrator
for Management
Office of Program Analysis and
Evaluation Studies and Evaluation
Service
Washington DC 20420

May 1988

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Analysis of the Education Program Approval Process:

A Program Evaluation

By

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May 1988

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GLOSSARY OF ABBREVIATIONS

AACRAO	American Association of Collegiate Registrars and Admissions Officers
AAES	Accrediting Agencies Evaluation Staff (Department of Education)
APP	Apprenticeship
BAT	Bureau of Apprenticeship and Training (Department of Labor)
CBD	Chief Benefits Director (Veterans Administration)
DOE	Department of Education
DOL	Department of Labor
DVB	Department of Veterans Benefits (Veterans Administration)
ELR	Education Liaison Representative (Veterans Administration)
ESU	Education Services Unit (Veterans Administration)
IHL	Institute of Higher Learning
NASAA	National Association of State Approving Agencies
NCD	Non-college Degree
OJT	On-the-Job Training
OPA&E	Office of Program Analysis and Evaluation (Veterans Administration)
RO	Regional Office (Veterans Administration)
SAA	State Approving Agency
SAC	State Apprenticeship Councils
U.S.C.	United States Code
VA	Veterans Administration
VARO	Veterans Administration Regional Office

ANALYSIS OF THE EDUCATION PROGRAM APPROVAL PROCESS: A PROGRAM EVALUATION

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ANALYSIS OF THE EDUCATION PROGRAM APPROVAL PROCESS: A PROGRAM EVALUATION

EXECUTIVE SUMMARY

BACKGROUND

Interest in the approval process for educational programs provided for veterans can be traced to 1947-48 when abuses of the GI Bill occurred following World War II. The State Approving Agencies (SAA) were established as a vehicle for states to disqualify poor-quality training establishments. Unless otherwise established by the law of the state concerned, the chief executive of each state is requested to create or designate a state department or agency as the state approving agency for such state. In the 1950's the life of the SAA function was extended to cover the Korean Conflict era and remains a part of chapter 36, title 38, United States Code.

As set forth in the statute, the states are reimbursed for "...reasonable and necessary expenses of salary and travel incurred by employees...and an allowance for administrative expenses." For the period FY 1979-87, the Veterans Administration (VA) obligated a total of $114.4 million, an average of approximately $12.7 million for each year. Since FY 1984 when the obligations were $12.5 million, there has been a steady decrease in the level of funding; in FY 1987 the maximum amount allowed was $9.3 million. In the face of budget reductions, concern has been expressed about maintaining program integrity by the National Association of State Approving Agencies and by some Veterans Administration professionals as well as staff members of the U.S. Senate and the U.S. House of Representatives. There was proposed legislation in 1987 (H.R. 1504 and S. 999, 100th Cong., 2nd Session) that SAA be funded annually from non-appropriated funds at a level not to exceed approximately $12 million.

The number of veterans in SAA-approved training programs has shown a steady decrease from a peak of nearly three million in FY 1976 to slightly less than one-half million in FY 1986. However, with the enactment of the Montgomery GI Bill, significant numbers of serviceperson/veteran-trainees and selected reservists are anticipated to participate in the education benefits program in future fiscal years. The concern of those entrusted with the provision of service to the participants in the Montogomery GI Bill is to improve the education program approval process and, thus, enhance the success of the Montgomery GI Bill.

In February 1987, the Department of Veterans Benefits requested that the Office of Program Analysis and Evaluation conduct a study of the education program approval process.

GENERAL METHODOLOGY

Four distinct study objectives were articulated. The first objective focuses on the education program approval process involving the VA and the SAAs as it currently exists and is limited to these organizations. To satisfy the second objective, time and associated costs for selected approval activities were calculated. The third objective involved the identification of successful approval process procedures for potential adaptation throughout the SAA system. Lastly, an overview of existing approval systems used by two other selected Federal government agencies is included for purpose of comparison.

Existing documents and automated data files were utilized wherever possible to minimize the impact of this study on State Approving Agency and VA staff. To collect data not available from existing sources, interviews and questionnaires were employed.

FINDINGS

The evaluation's major findings are summarized below:

1. Veteran Students Primarily Attend Institutes of Higher Learning. Eighty-six percent of the beneficiaries of the GI Bill and the Montgomery GI Bill attend institutes of higher learning which include two- and four-year colleges, teachers colleges; hospital nursing, intern, and residency programs; and professional and technical institutions.

2. Placement of State Approving Agencies in State Organisations Varies. States have placed the function for education program approval for veteran students in a variety of places in the state bureaucracy. Of the 72 SAAs, 9 (or 12.5 percent) are in a state division (service, department, or commission) for veterans, 16 (or 22 percent) are part of the state labor establishment, and 47 (or 65 percent) are part of the state education establishment.

3. Funding of the State Approving Agency Function is Not Timely. SAAs operate based on a contract with the Federal government which is administered by the Veterans Administration. Officially, the Federal fiscal year begins on the first of October; ideally, contracts are in place and funds are available as of that date. As of January 15, 1988, contracts were still not in place because of delays in approving the VA's FY 1988 budget. Uncertain funding threatens the effective operation of SAAs.

4. There Is Regional Variation in Education Program Approval Workload and Productivity. Not only the total number of approval/disapproval actions, but the actions per professional is highest in the Eastern SAA region.

5. Capability to Share Data Electronically is Not Used. Although more than 50 percent of the VA regional offices and SAAs have compatible equipment, no coordinated computer usage plan has been devised.

6. The Optimal Staff Size of SAA Office is Four Professionals. There are 30 SAA offices in 15 states that have two SAA offices which are less than the optimal size of four professionals.

7. Department of Labor Approves and Registers Apprenticeship Programs Nationwide. The Department of Labor, through its Bureau of Apprenticeship and Training (BAT), approved 43,163 programs in which 294,519 trainees were enrolled in FY 1987. The apprenticeship programs approved for veterans nearly always have BAT's prior approval. There is a significant number of on-the-job training approved for veterans which do not come under BAT's jurisdiction.

8. Department of Education Recognizes Accrediting Agencies Which Judge Quality of Educational Institution or Program. Accreditation of institutions by an agency or commission recognized by the Secretary of Education is a

prerequisite for Federal financial assistance for programs supported by the Department of Education. Accreditation is not a prerequisite nor a guarantee of approval of programs for veterans' training. About 95% of institutes of higher learning and 72% of non-college degree programs where there are current veteran enrollments are accredited.

ANALYSIS OF THE EDUCATION PROGRAM APPROVAL PROCESS: A PROGRAM EVALUATION

I. INTRODUCTION

PURPOSE

The purpose of this analysis is to provide the Veterans Administration's (VA) top management with information necessary to determine whether the current State Approving Agencies (SAA) process performs the functions outlined in title 38 U.S.C., chapter 36, sections 1771-9 and to describe unique approval techniques or practices employed by one or more SAA that may have instructional value for other SAAs. This analysis identifies and develops approval process structure models. In order to place the VA-SAA's process in perspective, a description of the education approval processes used by the departments of Labor and Education and a comparison of these with the VA-SAA is also provided.

BACKGROUND

Historical Perspective

Interest in the approval process for educational programs provided for veterans can be traced to 1947-48 when abuses of the G.I. Bill occurred following World War II. The SAAs were established as a vehicle for states to disqualify poor-quality training establishments. Unless otherwise established by the law of the state concerned, the chief executive of each state is requested to create or designate a state department or agency as the state approving agency for such state. In the 1950's the life of the SAA function was extended to cover the Korean Conflict and remains a part of chapter 36, title 38, United States Code.

As set forth in the statute, the states are reimbursed for "...reasonable and necessary expenses of salary and travel incurred by employees...and an allowance for administrative expenses." For the period FY 1979-87, the Veterans Administration obligated a total of $114.4 million, an average of approximately $12.7 million for each year. Since FY 1984 when the obligations were $12.5 million, there has been a steady decrease in the level of funding; in FY 1987 the maximum amount allowed was $9.3 million. In the face of budget reductions, concern has been expressed about maintaining program integrity by the National Association of State Approving Agencies and by some Veterans Administration professionals as well as staff members of the U.S. Senate and the U.S. House of Representatives. There was proposed legislation in 1987 (H.R. 1504 and S. 999, 100th Cong., 2nd Session) that SAA be funded annually from non-appropriated funds at a level not to exceed approximately $12 million.

The number of veterans in SAA-approved training programs has shown a steady decrease from a peak of nearly three million in FY 1976 to slightly less than one-half million in FY 1986. However, with the enactment of the Montgomery GI Bill, significant numbers of serviceperson/veteran-trainees and selected reservists are anticipated to participate in the education benefits program in future fiscal years. The concern of those entrusted with the provision of service to the participants in the Montgomery GI Bill is to improve the education program approval process and, thus, enhance the success of the Montgomery GI Bill.

Present Perspective

The Chief Benefits Director requested on February 18, 1987, that the Office of Program Analysis and Evaluation (OPA&E) explore an analysis of the cost-effectiveness of the SAAs. A number of issues were discussed. There was informal consensus that a cost-benefit analysis was not the appropriate tool to address the concerns of the group; rather, an evaluation of the education approval process was deemed more suitable.

In his March 3, 1987, letter to newly appointed members of the Commission on Veterans' Education Policy, which has its latest authorization in Public Law 99-576, the Administrator of Veterans Affairs defined the function of the Commission as one to study specific issues relating to the administration of chapters 30, 31, 32, 34, 35, and 36, title 38, United States Code. At the Commission's initial meeting on April 29, 1987, and in support of its own concern regarding the VA-SAA relationship, a Commission member proposed a study of the approval process.

Following a preliminary review of the legislation and existing VA documents regarding the operation of the present education program approval system, OPA&E staff determined that an overall analysis of the SAA process would most appropriately provide data to satisfy the concern of Agency managers and the Commission. The Commission is also conducting independent studies of a number of veterans' education issues.

SCOPE AND METHODOLOGY

This analysis focuses on the education program approval process involving the VA and the SAAs as it currently exists and is limited to these organizations. Some of the more successful approval process procedures have been identified for potential adaptation throughout the SAA system. An overview of existing approval systems used by two selected Federal government agencies is included for purpose of comparison.

Data for the analysis has been gathered from a variety of sources including Department of Veterans Benefits (DVB) management and statistical recurring reports. Personal interviews have been conducted with Veterans Administration Central Office and regional office (RO) personnel as well as staff members of selected State Approving Agencies and the two comparison agencies. To collect data related to cost and satisfaction of approval professionals at ROs and SAAs, survey questionnaires have been employed.

GENERAL OBJECTIVES OF THE ANALYSIS

There are four study objectives, each with methodological needs and constraints. The technical approaches used to address each are stated in the sections that follow.

OBJECTIVE ONE: Describe Present Education Program Approval Process

For this objective, a two-step approach was taken. The sequential events that comprise the program approval process were outlined to aid in the understanding of the process. These events were identified based on discussions held with VA and SAA professionals involved in the process and represent "what is" and may deviate slightly from "what should be" and are inclusive of activities which do not always take place in the sequence provided. Site visits were conducted in seven states, each selected because of specific demographic or state organizational characteristics. Questionnaires were developed to complete the nationwide survey of the SAAs and VA regional offices.

OBJECTIVE TWO: Determine Time and Costs Associated with Education Program Approval Process

This objective was approached in a collateral manner; time data was collected along with the descriptive information about the existing process. Median salaries of professionals were used to extrapolate costs associated with activities.

OBJECTIVE THREE: Describe Approval Process at Another Federal Agency

The Department of Labor's Bureau of Apprenticeship and Training plays an essential role in the approval process of apprenticeship programs for veterans. A review of their approval process is included to meet, in part, this study objective. Additionally, the approval process performed by the accrediting agencies recognized by the Department of Education is described. Personal interviews with agency professionals and a review of published documents provide core data for these descriptions. The two approval programs are compared with the approval process performed by the SAAs.

OBJECTIVE FOUR: Develop Models of Exemplary Education Program Approval Process Activities

As the two principals, the VA and the SAA professionals surveyed were asked to describe and/or share any innovative practices with the study team. The responses were grouped by type of practice as well as by process phase. The models were drawn from composites of ideas obtained from survey responses and during site visits.

PHASES OF THE STUDY

The study was executed in four phases: research and planning, data collection, data analysis, and report writing and delivery. The use of the four study phases as applied to each of the objectives of the study is presented below.

Research and Planning Phase

The study team attended an SAA-VA School Workshop sponsored by the regional office and the SAA in St. Petersburg, Florida. During this phase of the evaluation, interviews were conducted with managerial and technical staff in DVB and with key officers of the National Association of State Approving Agencies. From the orientation and the interviews, a study protocol was developed containing the study's general objectives, background, timetable, specific tasks and requirements, and deliverables. The protocol was distributed to the Chief Benefits Director (CBD) and the President of the National Association of State Approving Agencies.

Site visits were made to seven states for the purpose of (1) developing and testing a survey instrument to capture a general description of the approval process, (2) developing measures to collect data about the time required for specific tasks and to associate costs with the activities, and (3) developing data collection items for determining the attitudes of approval process professionals.

Data Collection Phase

To collect data from regional offices, a circular was developed that was transmitted to field stations by the CBD. This was DVB Circular 22-87-7, "Analysis of the Education Approval Process." To collect data from the State Approving Agencies, a data collection document that was very similar to DVB Circular 22-87-7 was sent to each of the 72 SAAs whether or not it was a member of the National Association and regardless of the existence of a formal contract with the VA. A pretest of these instruments was conducted at the VA Regional Office and the Tennessee Higher Education Commission (SAA) in Nashville.

As a result of the pretest visits, extensive amendments were made to the data collection instruments. Wherever appropriate, guidance was provided by the study team to enhance the reliability of estimates for time expended on the various activities. These tasks are discussed in Chapter III.

Data Analysis Phase

This phase of the study was divided primarily into six major tasks: (1) the development of fixed data formats for each of the two data collection instruments to which ROs and SAAs responded, (2) the entry by a private contractor of data from both of the data collection instruments mentioned above, (3) the validation by the study team of data entered by the contractor, (4) the creation of data files, (5) the development of detailed data analysis plans by the study team that, in turn, provided comprehensive instructions for computer programming, and (6) the writing of computer programs in the SAS language by the Office of Information Management and Statistics.

Report Writing and Delivery Phase

During this phase, the study's findings were determined based on the analysis of data for each of the study's objectives, and the study report was drafted, reviewed, and published.

ASSUMPTIONS

The assumptions for this study are based on discussions with staff in the Department of Veterans Benefits and the National Association of State Approving Agencies. The assumptions are as follows:

1. Data will cover the period March 1980 through November 1987;

2. Identification of current SAA offices was made by the Education Central Office Operations Staff in Veterans Administration;

3. All labor costs are computed by weighing the self-reported median salary for each SAA office by the number of professionals and the

salary associated with the median grade of VA education liaison representatives (ELR) at each station;

4. The number of work hours in FY 1987 is 2087;

5. Indirect costs have not been included because in many states cost figures were not available;

6. The number of training sites are those where there are current trainees receiving education benefits from the VA. In the absence of exact figures, respondents were directed to specific sources as a basis for making estimates;

7. Activities related to the Jobs Training Act program are not included;

8. The costs incurred by the Veterans Administration regional office adjudication staff in confirming approval status of the veterans are not included;

9. Although not included in any calculations, the five SAA offices which did not respond to the survey were treated as having a total of six full-time professionals when reporting system size; and

10. All responses are treated as being equal; no weight has been given for size or workload of respondent's unit (VA or SAA).

ANALYSIS OF THE EDUCATION PROGRAM APPROVAL PROCESS: A PROGRAM EVALUATION

II. DESCRIPTION OF EDUCATION PROGRAM APPROVAL PROCESS

INTRODUCTION

Chapters 30-32 and 34-36 of title 38 and chapter 106 of title 10, United States Code provide for various education benefits to veterans, servicepersons, dependents, survivors, and reservists. The two major education benefits programs administered by the Vocational Rehabilitation and Education Service of the Department of Veterans Benefits (DVB) are those commonly termed the GI Bill and the Montgomery GI Bill. The first refers to the educational assistance for veterans and service personnel; the second is the educational assistance scheme for the All-Volunteer Force and Selected Reserves.

Between 1980 and 1987, education benefits were paid for a variety of educational, training, and special programs such as vocational rehabilitation under chapter 31 (see Table II-1); however, of the total trainees receiving educational benefits under title 38 provisions, the largest beneficiary group during this decade has been chapter 34 veterans. The current chapter 34 program ends December 31, 1989; this benefit program served Post-Korean and Vietnam era veterans as well as servicepersons who served on active duty for a period of more than 180 days between January 31, 1955, and January 1, 1977,

TABLE II-1
TRAINING BY PROGRAM TYPE, 1986 & 1987

PROGRAM TYPE	NUMBER OF TRAINEES	
	1986	1987
Post-Korean (Ch 34)	307,637	238,798
Post-Vietnam (Ch 32)	63,221	76,772
Montgomery GI Bill-Reservists (Ch 106)	31,678	52,459
Children & Spouses (Ch 35)	54,233	48,695
Vocational Rehabilitation (Ch 31)	25,776	24,599
Montgomery GI Bill-Active Duty (Ch 30)	1	130
TOTAL	482,546	441,453

Source: VA Annual Reports, 1986 & 1987

and who were discharged under conditions other than dishonorable or who were discharged due to service-connected disability.

Chapter 34 allows for payment of a statutory monthly allowance to cover subsistence, tuition, fees, supplies, books, equipment, and other educational costs. Payment for institutional training is based on rate of training (full, three-quarters, half, and less than half-time) and number of dependents; other rates were provided for flight, correspondence, cooperative, apprentice and other on-the-job training. Rates are set by Congress and were increased to their present levels effective October 1, 1984.

OVERVIEW OF EDUCATION PROGRAM APPROVAL/PAYMENT PROCESS

In the case of an education facility which has no current approval for veterans, the education program approval/payment process begins when a facility contacts the State Approving Agency (SAA) and can be said to end when the beneficiary receives his/her first benefit check. The major activities that are involved in the process are described in Chapter 3.

In reading this chapter and the chapters which follow, the role of two major participants in the process will be elaborated upon: the Veterans Administration (VA) professionals and the SAA professionals.

The VA professionals involved most closely with the education program approval process are the education liaison representatives (ELR) and the compliance survey specialists (CSS) who are in the Education Services Unit of the Veteran Services Division of the VA regional office. ELRs serve as the focal point for education-related issues in the regional offices. ELRs are the contact person for school officials and SAA staff members; they review SAA-submitted documents for completeness and correctness; they are responsible for creating manual and automated records and files related to students and education facilities; and they monitor SAA contracts and review vouchers submitted by the SAAs. The CSSs have the responsibility of monitoring at both the student and the facility level such things as enrollment and attendance, standards of progress, award/payment levels, and adherence to applicable regulations. In some regional offices, the functions of the CSS and the ELR are performed by the same individual. (The VA also has an Education Central Office Operations Staff at its headquarters in Washington, D.C. which executes contracts with the SAAs and is the approving authority for programs offered by foreign schools, correspondence courses, and Federal agencies.)

The SAA professionals approve and supervise individual programs of education and training for veterans' benefits programs. They also serve as a liaison between the VA and the education facilities. Frequently the SAAs are the initial source of information and guidance for institutions with veteran trainees; the SAAs make periodic supervisory visits to facilities to insure the Federal and state requirements for approval continue to be met and work with school or training site officials to correct deficiencies if any exist. The SAAs communicate state standards of quality to the local education and training community.

TYPES OF EDUCATIONAL PROGRAMS

Under the provisions of the U.S.C., title 38 and title 10, veterans and dependents of veterans may enroll in a wide variety of educational programs; the type of program providing training is categorized by the Veterans Administration (VA) and the State Approving Agencies (SAA) in the following manner: Institutions of Higher Learning (IHL), Non-college Degree (NCD), Apprenticeship (APP), Other On-the-Job Training (OJT), and Farm Cooperative. The same classification system is used throughout this report.

Institutes of Higher Learning

The IHL category includes universities, four-year colleges, professional and technical institutions as well as teachers colleges; hospital nursing, intern, and residency programs; and two-year business, junior, and community colleges.

Non-College Degree

Typical examples of NCD programs are business, vocational, or trade schools; vocational and technical specialty programs; and elementary or secondary education institutions. Flight, correspondence, and cooperative training are also in this category.

Apprenticeship

Apprenticeship is a system designed to provide workers entering industry with comprehensive training by exposing them to the practical and theoretical aspects of the work required in a highly skilled occupation. This is accomplished through structured on-the-job training and related theoretical instruction. It involves planned, day-by-day training on-the-job and experience under supervision combined with related technical instruction.

The term of apprenticeship training authorized for title 38 beneficiaries is one to six years (but not less than 2,000 hours), depending on the length of time determined to be necessary to complete the prescribed program. In addition to the supervised job instruction, the apprentice should complete a recommended 144 hours of formal instruction related to the skill or trade.

On-the-Job Training

On-the-job training is hands-on, supervised instruction in a specific job and/or skill. OJT programs are developed to allow the trainee to achieve full competency in the job and/or skill and has the goal of preparing the trainee to advance to the highest level attainable in the job.

The authorized length of training for title 38 benefits is six months to two years. There is no established requirement for formal instruction.

Farm Cooperative

While it is legally possible to get training benefits for farm cooperative programs, the number of trainees in this category is negligible. In 1987, only two states reported any program approvals in this category. Because of the extremely low participation rate, this category is not included in the analysis.

ACCREDITATION STATUS OF IHL AND NCD PROGRAMS

As described later in Chapter V, the Department of Education has a process of granting recognition to accrediting bodies which judge the quality of educational institutions and/or programs. Accreditation is a prerequisite for Federal financial assistance to the institutions as well as to the students attending such institutions under a wide variety of Federally supported programs.

The ROs reported that 4,180 IHL and 2,418 NCD active program sites were approved for veterans in FY 1987. Of this number, approximately 3,988 or 95 percent of the IHLs are accredited by a nationally-recognized accrediting body. Approximately 1,753 or 72 percent of the NCDs are accredited. (See Table A-1 in Appendix A.)

DISTRIBUTION OF VETERANS UTILIZING EDUCATIONAL BENEFITS (1980-87)

The pattern of distribution of trainees receiving education benefits has consistently shown heaviest enrollment in IHL facilities. Table II-2 below shows the total number of chapter 34 veterans in training during the year by type of institution.

TABLE II-2
CH 34 VETS TRAINING BY TYPE OF INSTITUTION, 1980-1987

	FISCAL YEAR							
	1980	1981	1982	1983	1984	1985	1986	1987
TYPE								
IHL	842,088	736,018	620,341	517,485	421,280	326,012	257,568	202,616
NCD	148,551	122,448	97,739	88,068	78,013	53,634	40,596	29,624
A&O	74,148	55,211	38,491	25,444	19,499	5,197	9,473	6,558
TOT	1,064,787	913,677	756,571	630,997	518,792	394,843	307,637	238,798

Source: VA Statistical Report RCS 20-0291, Tab 1a

There are veterans attending educational facilities located in all states and in a number of foreign countries. Enrollment, or the number of beneficiaries who trained during the year, follows general population distribution patterns. The study addresses only those institutions which are in the United States; California, Texas, Florida, and Ohio each had more than

10,000 trainees in 1987, totalling over 69,000 students. Appendix A, Table A-2, "Geographical Density and Workload: VARO and SAA Offices, 1987," shows the distribution of veteran students by state in the column headed Trainees.

PROFILE OF EDUCATION PROGRAM ACTIVITY LEVELS

There is enormous variation to be found nationwide in the level of education program activity; three measures are presented here to suggest various dimensions of the issue: distribution of trainees by type of facility, trainee density by program type, and the volume of approval and disapproval actions taken by SAAs. Data in VA statistical reports generally present total trainees per year. Unless stated otherwise, the figures presented in this report represent spring 1987 data and are tabulated from the survey responses. (The differences between the number of trainees reported in Table II-2 above and Table II-3 below, for example, reflect the differences of the data sources.)

Distribution of Trainees

Based on responses to the questions posed by the study team, the number of trainees at the four types of institutions showed a preponderance of enrollments at IHLs. The figures gathered from the VA regional offices (RO) are reflected in Table II-3 below; the incomplete reporting by the SAAs made it impossible to cross validate numbers from the two sources.

TABLE II-3
NUMBER OF TRAINEES BY TYPE OF INSTITUTION, 1987

TYPE		TRAINEES	PERCENT
IHL		191,781	85.8
NCD		28,177	12.6
APP		2,300	1.0
OJT		1,329	0.6
	TOTAL	223,587	100.0%

Trainee Density

SAA and VA field professionals suggested that program managers would be better equipped to make policy decisions regarding the need for and frequency of supervisory visits if there was data showing program density, that is, the number of trainees per site. The significance of trainee density is twofold: the time required for examination of student records and the relative use of resources to make a visit to a site with very few trainees needs to be compared to the value gained. In Table II-4 below, the number of trainees, the number of sites on an institutional basis, and their ratios are given.

TABLE II-4
TRAINEE DENSITY BY TYPE OF FACILITY, 1987

TYPE	SITES	TRAINEES	RATIO
IHL	4,180	191,781	45.88
NCD	2,418	28,177	11.65
APP	1,273	2,300	1.81
OJT	700	1,329	1.90
TOTAL	8,571	223,587	

Approvals & Disapprovals

Another measure of the level of activity at each approval agency has been reported by the SAAs, namely, the number of approval/disapproval actions. The data are accumulated and reported in the aggregate; local officials may choose to compare the level of activity of their agencies with the national pattern presented in Table II-5 below.

TABLE II-5
PROGRAM ACTIVITY LEVEL BY TYPE OF INSTITUTION, 1985-1987

	1985		1986		1987	
	APPROVALS/DISAPPROVALS		APPROVALS/DISAPPROVALS		APPROVALS/DISAPPROVALS	
IHL	16,951	312	17,496	284	19,757	350
NCD	7,395	329	7,616	452	6,844	415
APP	1,347	349	1,217	483	1,178	323
OJT	1,374	1,491	1,358	1,460	986	1,438
TOTAL	27,067	2,481	27,687	2,679	28,765	2,526

As a rough gauge to the number of approval/disapproval actions completed by approval agents, the total annual number of approvals and disapprovals, as reported by the SAA professionals, has been divided by the total number of SAA professionals utilized during the 1987 period. The approval/disapproval actions nationwide, across all types and sizes of program types, annually is 179.8 per SAA professional. SAA professionals report spending 15 percent of their total time for approval/disapproval actions. (See Table II-15, Approval Activities Performed by SAA Professionals.)

PROFILE OF STATES

This section does not present detailed information about specific states; rather, it attempts to profile the variations to be found among the states. The areas to be described include program size, computer and communications capabilities, organizational placement of SAA, role of organized labor vis-a-vis apprenticeship programs, setting of SAA salaries, fiscal year and funding variations, and relationship with other state agencies.

Program Size

In addition to the number of facilities, numbers of trainees, and program activity levels already provided in this chapter, it is possible to classify program size by the number of professionals engaged in the education approval process as well as the number of approval agencies and regional offices per state. Some VA regional offices have payment jurisdiction and liaison responsibilities in adjacent states. However, with no exception, the jurisdiction of each SAA is confined to state borders.

The total number of education liaison representatives in FY 1987 were self-reported as being 53.0; the other regional office staff members with a role in the overall approval program, compliance survey specialists, for the same period totaled 85.2. The number of SAA professionals in FY 1987 was greater than 174; it should be noted that not all SAAs responded to the questionnaire so the figure for SAA professionals is underreported by at least six people. Thus, the total number of state and federal professionals involved in the education program approval process was approximately 318 for the last fiscal year.

There are a total of 129 offices involved in the education program approval process. Thirty-two VA regional offices report having one SAA in their state and 20 report having two SAA offices for a total of 72 SAA offices in the system. Conversely, there are states with multiple regional offices: one state has three, three states have two, and the remaining 48 states have one regional office for a total of 57 ROs, excluding the RO in Manila which serves also as the approving agent.

Table A-2 in Appendix A details the geographical distribution of both the ELRs and the CSSs in the education services unit (ESU) at the VA and the SAA professionals and supplies a close approximation of the number of trainees (excluding chapter 106 beneficiaries) for each state. It should be noted that the column that reports the number of training sites is to be associated with the sites serviced by the SAA(s) in the state and does not include the sites for which the VA is the approving agent.

The great variety that exists from state to state makes numerical comparisons less than useful if the numbers are used in isolation. Factors such as the number of individual approvals at a single institution, the distance between sites, the type of program being approved, the knowledge and experience of the approving professional, and the combination of program types each SAA professional must master must be considered when trying to determine how many professionals are needed to fulfill the SAA-VA contract responsibilities.

However, numbers should not be categorically ignored. As an example, a count of trainees receiving benefits in any state should outnumber the number of active facilities in that state and, therefore, could serve as a maximum for the number of site visits reimbursed for a year in the state.

At least twelve SAA offices had fewer than one full-time professional in fiscal year 1987. (See page APP-A-2.)

Computer & Communications Capabilities

With so many professionals engaged in collecting and maintaining data related to education program approval, the role played by communications is of great importance. In an era of budget constraints, all parties are looking for improved methods to accomplish at least the same level of activity without sacrificing quality of effort. The purpose of focusing on computer or ADP and communications capabilities is to see where time can be saved and how reporting discrepancies can be reduced.

In this analysis, an attempt was made to catalog the existing capabilities of two of the participants in the process, namely the state approving agencies and the VA regional offices. For a complete picture, it would be vital to also query the education facilities and training sites.

In the table below, the computer equipment which is currently available and/or readily accessible to the SAA and VA professionals is detailed; the numbers reported reflect the number of offices where the equipment is available and is not a count of the pieces of equipment even though some VA offices have reported multiple types of equipment. For this analysis, there was no need to know if multiple units were available because the focus is the capability to share information electronically.

TABLE II-6
COMPUTER EQUIPMENT AVAILABLE FOR APPROVAL PROFESSIONALS

TYPE	VA EDUC UNIT	PERCENT	SAA OFFICE	PERCENT
IBM-PC or compatible	43	75.4	31	49.2
WANG	54	94.7	11	17.5
WANG-PC	12	21.1	6	9.5
"laptop" or portable	1	1.8	5	7.9
Honeywell	55	96.5	1	1.6
IBM-5520	5	8.8	0	0
other	2	3.5	9	14.3
TOTAL	172		63	100.0%

An examination of the raw numbers above indicates one of the problems: while more than 94 percent of the VA offices have equipment from Wang and Honeywell, the SAAs show a decided preference (49 percent) for IBM. The most straightforward way for the SAA and the VA to share non-restricted data would be to have equivalent computer equipment and to transfer data over a telephone line with a modem at each end. Unless the VA field offices equip themselves with IBM or the Wang 280 or 380 which are IBM compatible, there can be minimal electronic sharing of non-restricted data using this straight transfer. It is more complex to use computer software to transform the format of the data (Wang and IBM require different formats) so a Wang can "talk" to an IBM. (The technology and the software currently is on the market which allows for a Wang and an IBM to communicate either at independent workstations or at the minicomputer level.)

The cost of not implementing a coordinated computer usage plan for the VA and the SAA is that files must be built and maintained independently at multiple locations. This "independence" results in a duplication of effort. Moreover, the likelihood that there will be differences in the data in the two files is inherent to having two separate systems.

Organizational Placement of SAA

Of considerable relevance to anyone trying to set nationwide policies or to implement procedures for multiple locations is the organizational placement of each SAA within its own state or commonwealth structure. As is true with other state programs such as the state veterans programs, states have placed the function for education program approval for veteran students in a variety of places in the state bureaucracy. Of the 72 SAAs, 9 (or 12.5 percent) are in a state division (service, department, or commission) for veterans, 16 (or 22 percent) are part of the state labor establishment, and 47 (or 65 percent) are part of the state education establishment. Those in the education divisions are in postsecondary or adult education (20 or 28 percent), kindergarten through twelfth grade education (19 or 26 percent), and vocational/technical education (8 or 11 percent).

As part of this data analysis effort, SAAs were asked to report how the chief state official of education or higher education comes to his position (Table II-7) and to describe the relationship between the SAA and the highest official in the appropriate state department or agency (Table II-8).

The degree to which a state office is subject to political considerations is not easy to measure. However, since 58 percent of the SAAs are housed in the education division of their states' organization, it is possible to make some inferences about the degree to which the entire education division is sensitive to politics by examining the method by which the top state education official achieved his/her position. The results are tallied in the table below and suggest that over 40 percent of the chief education officials directly owe their position to some political process.

TABLE II-7
RELATIONSHIP OF CHIEF EDUCATION OFFICIAL TO STATE ADMINISTRATION

	NUMBER	PERCENT
Appointed by Board	35	54.7
Appointed by Governor	13	20.3
Elected	13	20.3
Other	3	4.7
TOTAL	64	100.0%

To complete the understanding about whether there is a bond between the SAA and the state's political structure, SAA survey respondents were asked about the link between the SAA and the chief official in their agency or department. The results show a fairly even distribution between those with staff relationship and those with line relationship to the top official; however 21 percent stated there is some other relationship.

TABLE II-8
RELATIONSHIP OF SAA TO CHIEF, STATE DEPT/AGENCY OFFICIAL

	NUMBER	PERCENT
Staff Responsibility	26	41.9
Line Responsibility	23	37.1
Other	13	21.0
TOTAL	62	100.0%

Role of Organized Labor

Particularly for the apprenticeship and the on-the-job training programs, it can be important to understand the role of organized labor within a state. In the tables below, the general outline of the state variations is apparent.

TABLE II-9
UNION OR NON-UNION STATUS OF STATE

	NUMBER	PERCENT
Union or Apprenticeship Council	26	40.6
Non-Union or "Right to Work"	23	35.9
Other	8	12.5
Unknown to SAA	7	10.9
TOTAL	64	99.9%

TABLE II-10
INFLUENCE OF ORGANIZED LABOR ON APPRENTICESHIP PROGRAM

	NUMBER	PERCENT
Considerable	23	36.5
Moderate	20	31.7
Negligible	14	22.2
No Comment	6	9.5
TOTAL	63	99.9%

Setting of SAA Salaries

Although the national median salary paid an SAA professional is $35,880, there is considerable variation (see section, Salary Levels, following Table II-16). In part, the variation reflects the differences among states and/or commonwealths' salary scale. A second cause of salary variation occurs within the states themselves: while 81.5 percent of the 65 SAAs reported that the professionals' salaries are set using the state salary scale, 10.8 percent are negotiated and another 7.7 percent specified some other method of setting the salary.

Fiscal Year & Funding Variations

SAAs operate based on a contract with the Federal government which is administered by the Veterans Administration. Officially, the Federal fiscal year begins on the first of October; ideally, contracts are in place and funds are available as of that date. Even if this ideal condition had been met the past two fiscal years, there is still an obstacle to smooth fiscal sailing. Of those reporting, only three SAAs, or 4.5 percent, share October first as the beginning of the fiscal year; the majority (61 or 92.4 percent) of states begin their fiscal calendar on July first while another two (3.0 percent) use some other calendar.

Those SAAs whose fiscal years do not coincide with the Federal fiscal calendar have constructed methods of dealing with the lag between the state and Federal budget calendars. Three of these methods are listed in the table below.

TABLE II-11
METHOD FOR FUNDING OF SAAs DURING FISCAL LAG

	NUMBER	PERCENT
Use of State Funds	36	59.0
Expenses Accrued	13	21.3
Moratorium on Payments	2	3.3
Other	10	16.4
TOTAL	61	100.0%

PROFILE OF PROGRAM PROFESSIONALS

In the course of site visits around the country, the study team met a great number of dedicated, concerned professionals both at state approving agencies and at the regional offices of the VA. These individuals share an interest in providing the best educational opportunities for eligible veterans, veterans' dependents, and reservists. In this section, a number of aspects regarding the training, background, and other responsibilities of these VA and SAA professionals are explored; also the perceptions of these professionals towards a variety of issues will be presented.

VA and SAA Professionals

Formal Education

The education program approval people possess a myriad of backgrounds, both with regard to formal education and to previous work experience. Among the SAA professionals themselves, there is a wide range in the years of formal education between those professionals with the least number (12 years) and those with the most number (more than 20 years) of formal education. Table II-12 gives the average number of years and the range for the VA and SAA professionals. At least 22 of the SAA professionals reported having twenty or more years education while only one of the ELRs had more than 19 years. (Standard deviations have been computed for all calculations of averages. Means and standard deviations appear in Appendix E.)

TABLE II-12
FORMAL EDUCATION OF VA and SAA PROFESSIONALS

	AVERAGE YEARS	RANGE
VA Educ Liaison Reps	15.8	12 - 20+
SAA Professionals	17.2	12 - 20+

Previous Work Experience

Frequently the work experience of an individual enhances or may substitute for formal education. Conversations with professionals in both the SAA and the VA provided the categories for responses. In general, education liaison representatives (ELR) felt that within three years an ELR could be fully independent; the queried SAA professionals felt that it might take as many as five years for a consultant to be able to perform in all areas of his work equally well and independently. This difference between the two groups is provided for by the addition of one alternate answer for the SAAs. The years of experience in current position were categorized for ELRs as less than one year, one to three years, and more than three years. Currently 58 percent of the ELRs are in the group with more than three years and another 33 percent have one to three years experience as an ELR. The SAAs had the additional category of three to five years for the question about the length of time the SAA professional with the greatest longevity had served; the most frequent response (94 percent) was three to five years. Thus, both groups have sufficient years of experience in their current position to know the function well.

The work experience of the 102 SAA professionals with responsibility for approving IHL programs included the following: kindergarten-12th grade (K-12) teacher (50 percent), postsecondary teacher (34 percent), guidance/career counselor (34 percent), postsecondary administrator (28 percent), adult education/vocational technical teacher (21 percent), adult education/

vocational technical administrator (19 percent), or K-12 administrator (13 percent).

The previous work experience of the 85 SAA professionals with responsibility for approving NCD programs included the following: teacher of certificate program (33 percent), state licensure work (33 percent), administrator of certificate program (18 percent), business owner (7 percent), member of accrediting board (5 percent), and other experience (57 percent).

The previous work experience of the 57 ELRs was reported as most frequently being a compliance survey specialist (72 percent). Other work experience included the following: veteran benefits counselor (58 percent), vet representative on campus (39 percent), adjudicator (32 percent), and instructor or teacher (25 percent). Other work experience was reported by 37 percent of the ELRs.

Training

Both groups of professionals were questioned about their training opportunities (multiple responses were permitted) and satisfaction with the training they received. Their responses are tallied in the tables below.

TABLE II-13
TRAINING OPPORTUNITIES FOR VA AND SAA PROFESSIONALS

	VA-ELR		SAA	
TYPE TRAINING	NUMBER	PERCENT	NUMBER	PERCENT
Master-Apprentice	18	22.2	39	39.0
Formal; Structured	9	11.1	29	29.0
Self-Taught	49	60.5	24	24.0
Other	5	6.2	8	8.0
TOTAL	81	100.0%	100	100.0%

TABLE II-14
TRAINING SATISFACTION: VA AND SAA PROFESSIONALS

LEVEL OF SATISFACTION	VA-ELR NUMBER	VA-ELR PERCENT	SAA NUMBER	SAA PERCENT
Outstanding	5	8.9	6	9.1
Good	18	32.1	30	45.5
Adequate	18	32.1	26	39.4
Poor	9	16.1	3	4.5
Unsatisfactory	6	10.7	1	1.5
TOTAL	56	99.9%	66	100.0%

Approval Activities of SAA Professionals

The responding SAAs were asked to report the percent of total time spent performing VA-SAA duties for a variety of activities. The greatest amount of time was spent on visits (22.3 percent on supervisory visits and 12.1 percent on inspection visits). The next most time-consuming activity was approval and disapproval actions. IHL and NCD catalog review plus travel time accounted for about one-eighth of the average total time spent on VA-related activities. (See page AA-E-1.)

TABLE II-15
APPROVAL ACTIVITIES PERFORMED BY SAA PROFESSIONALS

ACTIVITIES	PERCENT OF TIME
Supervisory Visits	22.3
Approvals/Disapprovals	15.4
Catalog Review	13.0
Traveling to and from Sites	12.2
Inspection Visits	12.1
New Program Development (APP, OJT, Farm)	8.6
Review of Previously Approved Programs	7.3
Keeping Statistics for the VA	5.8
Visits at the Request of the VA	4.3
Information/Outreach Activities	4.2
Meeting/Discussing Concerns with the VA	4.2
Advising/Consulting with Other State Agents	3.9
Other VA-related Activities	4.2
Other non-VA Activities	7.3
(66 total responses)	

Figures do not add to one-hundred percent because they are averaged & rounded.

Other Responsibilities

Not all of the people who are responsible for this portion of delivering educational benefits to veterans, their dependents, and/or reservists are assigned full-time to the task. Most commonly if the ELR is assigned another job at the VA, she or he is assigned as a compliance survey specialist. The table below indicates the range of approval responsibilities that SAA professionals have when they do not serve as full-time SAA consultants. Half of the SAAs responded that they have other (non-VA) approval responsibilities. Multiple responses were accepted.

TABLE II-16
OTHER APPROVAL ACTIVITIES PERFORMED BY SAA PROFESSIONALS

	NUMBER	PERCENT
License Proprietary Schools	18	54.5
State School Programs	5	15.2
Other Federal Programs	4	12.1
Other	17	51.5
(33 total responses)		

Salary Levels

While ELRs' salaries are based on the Federal salary scale, and are therefore fairly uniform and average $32,371, there is little uniformity among the salaries of SAA professionals. There is great disparity between the lowest ($16,000) and highest ($56,300) average salary paid an SAA professional in any state; the average professional salary paid at the SAA offices responding to the questionnaire is $35,880. (See page APP-E-1.)

Perceptions of Program Participants

The VA and SAA professionals were asked a number of questions which required them to portray their perceptions related to a number of issues. The questions were asked in the same format of both the Federal and the state people. There was not universal response to all items. In addition, in a few instances it was reported to the study team that the answers were reviewed by managers who had a different view from the initial respondent.

In structuring the questionnaire, items were developed as forced-choice, closed-ended questions. For each item space was provided where some respondents elected to make comments. For a succinct presentation, the data are summarized in this chapter in topic areas. For more detailed data for each question, refer to Exhibit A-1 beginning on page APP-A-3.

Goal of the Education Program

More than 80 percent of the SAA professionals agreed with the statement that the ultimate purpose of the education approval program is to enable veteran students to become more employable. This view was shared by 84 percent of the ELRs. Whether a student, as better than 86 percent of the current education benefits recipients are, is pursuing a program at an IHL or in an OJT program, the VA and SAA professionals view this as improving the individual's prospect for obtaining gainful employment. (See page APP-A-3.)

The education approval program is seen by some survey respondents as a barrier to abuses of the program. When asked if the approval process helps to curb improper payment, 86 percent of the VA respondents and 85 percent of the SAA respondents agreed or strongly agreed. (See page APP-A-4.)

Red Tape

Although a number of respondents would have preferred that the question be asked differently, 64 percent of the SAAs responded that because of the cumbersome nature of the rules and regulations governing VA's education benefit program, the best interest of the veteran students is not being served. Less than one-third of the VA respondents were of the same opinion; 72 percent of the VA professionals disagreed or strongly disagreed with the statement. (See page APP-A-5.)

There was a striking similarity of opinion, however, between the two groups of professionals when asked about the role of paperwork in the work of a conscientious SAA professional. Approximately two-thirds of both groups view paperwork as a small portion of an effective SAA professional's job. (See page APP-A-6.)

Program Quality

Of great concern to state and Federal education professionals is the issue of quality education. The questionnaire item which addressed the program participants' perceptions regarding this complex topic showed that, in the opinion of 54 percent of the VA professionals, the education program approval process does not assure that a veteran is enrolled in a quality education/training program while only 18 percent of the SAA professionals are of the opinion that the approval process doesn't assure that a veteran is enrolled in a quality program. (See page APP-A-8.)

Frequency of Supervisory Visits

There is agreement (63 percent of the VA respondents and 65 percent of the SAA respondents) that the current prescription for making annual supervisory visits is appropriate. The SAA respondents were asked to specify the ideal frequency for supervisory visits by program type; two-thirds of them said that annual supervisory visits for IHLs is appropriate while about one-quarter felt that IHLs should be visited twice a year.

Elimination of or Changes to Selected Approval/Payment Process Phases

When given an opportunity to suggest the elimination of steps in the current process, only 11 (of 52) VA respondents and 4 (of 66) SAA respondents identified any parts of the approval process for elimination. However, when given the opportunity to suggest changes to the process, the response rate was heavier. The steps which were marked are few and are apparent in the table below. The process was divided into thirteen steps or phases and is described more fully in Chapter III.

TABLE II-17
ELIMINATION/CHANGES IN APPROVAL/PAYMENT PROCESS PHASES

PHASE OF	ELIMINATION				CHANGE			
APPROVAL	VA-ELR		SAA		VA-ELR		SAA	
PROCESS	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT
1	--	--	--	--	1	1.8	--	--
2	5	8.8	2	3.0	10	17.5	2	3.0
3	1	1.8	--	--	6	10.5	--	--
4	1	1.8	2	3.0	3	5.3	5	7.6
5	--	--	1	1.5	7	12.3	4	6.1
6	1	1.8	1	1.5	3	5.3	2	3.0
7	2	3.5	3	4.5	6	10.5	5	7.6
8	2	3.5	--	--	2	2.5	1	1.5
9	2	3.5	--	--	1	1.8	1	1.5
10	11	19.3	--	--	21	36.8	10	15.2
11	--	--	4	6.1	5	8.8	6	9.1
12	6	10.5	1	1.5	7	12.3	3	4.5
13	5	8.8	1	1.5	5	8.8	2	3.0
all	1	1.8	--	--	--	--	1	1.5

Need for Regulatory Change

Some of the changes that are viewed by the participants in the process as being positive may require changes to the present written regulations. In addition to the changes indicated in the previous section, when asked if the VA regulations keep up with the education trends in the state, 56 percent of the responding SAA and 67 percent of the VA professionals said the regulations lag behind education practices. (See page APP-A-9 in Appendix A.) VA rules were viewed as cumbersome to the degree that they interfere with providing the best possible benefit to the students by 64 percent of the SAA but only 28 percent of the VA professionals. (See page APP-A-5.)

Consumer Protection for Veterans

In a system as large as the education system in this country, it may be expected that there will, at least on occasion, be programs which get approved for veterans which do not give value for the trainee's time and money. The VA and SAA professionals were asked what forms of consumer protection exist. Licensing and/or state accreditation is viewed by SAA and VA professionals as the greatest source of protection; additionally, the placement of the SAA in the state education department was strongly viewed as providing some assurance to the veteran student that the provider of his/her training was offering a legitimate program. The table below summarizes the responses. (Multiple responses were permitted.)

TABLE II-18
CONSUMER PROTECTION FOR VETERAN TRAINEES

	VA-ELR		SAA	
	NUMBER	PERCENT	NUMBER	PERCENT
NCDs are licensed &/or accredited by state	53	93.0	49	74.2
IHLs are licensed &/or accredited by state	48	84.2	47	71.2
SAA is part of state education department	43	75.4	40	60.6
Other	15	26.3	18	27.3

Involvement of SAA in Apprenticeship Program Development

VA regional office staff were asked to rate the degree of involvement they perceived the SAAs to have in the development of apprenticeship programs. SAA professionals were also asked to state the percentage of their time spent in development activities.

On average, the SAA professionals reported spending 8.6 percent of their time on new program development. Program development was reported as one of the five most critical activities, however, by 27.3 percent of the SAA survey participants, suggesting that more time might be spent on program development.

Most Critical Activities

The activities that were most frequently cited as being critical by the SAA professionals, in rank order, were: approvals/disapprovals (90.9 percent), supervisory visits (84.8 percent), inspection visits (78.8 percent), and IHL and NCD catalog review (69.7 percent).

VA professionals consistently (89.5 percent) rated the review of documents from the SAA as among the most critical. In rank order, other activities that were frequently cited are: IHL and NCD catalog review (87.7 percent), review of apprenticeship and OJT documents from the SAA (59.6 percent), and telephone contact with facilities about approval and/or certification (56.1 percent).

DIVISION OF ACTIVITY AND RESPONSIBILITY

The U.S.C. is clear in its assignment of the approving authority to the states; additionally, there are activities incumbent upon the VA. Because the money which funds the SAA's activities as well as the money which is paid out in education benefits is administered by the VA, there is a need for the VA to participate in the overall process. Historically there have been instances when individual states have opted to exercise the clause in the U.S.C. which permits them to not serve as the approval agent. Described below is the typical distribution of responsibilities between the state and Federal governments whose interests are represented by the SAAs and the VA respectively.

State Approving Agencies

By mandate and in practice, the SAAs serve as the agents of the chief executive of their states; they serve as a "vehicle for states to disqualify poor-quality training establishments" as well as the principle liaison between the schools and the VA in matters of program approval. The position of the SAAs is strengthened by Executive Order (#12612) dated October 26, 1987, which calls for each Federal agency to allow states the greatest flexibility and maximum discretion in developing policies and administering Federal programs.

In general terms, the SAAs serve as the translators of VA regulations and interpret Federal and state policies for VA benefits for the education program providers. As state employees, the SAA professionals often represent the official state authority with state education administrators. Eighteen of the SAAs (25 percent) represent the state's power to grant and revoke licenses of proprietary schools. Of the responding SAA offices, five (7 percent) perform other state school approval functions.

More specifically, in terms of activities, the SAAs are frequently the initial source of information and guidance for institutions with veteran trainees and serve as a liaison between the VA and the education facilities. The SAA consultant makes a site visit and assembles the VA documents which are required prior to approval of a program of study for veteran students. The

SAA then completes a review of documents and forwards a package to the VA. At any time following an approval, the SAA may be requested by the VA to re-visit the institution or training site, particularly if there are observed or suspected deficiencies.

Veterans Administration

The VA is the exclusive approving authority for programs offered in foreign countries (excluding branches of U.S. schools), Guam, Samoa, and the Republic of Panama; Veterans Job Training Act (VJTA) programs offered in more than one state; courses offered by agencies of the U.S. government; and correspondence courses. Courses permitted under the chapter 31 vocational rehabilitation program are individually approved by VA staff without any SAA involvement. Also the VA may assume the duties listed above for the SAA if the state elects to not perform the duties for all or any specific type of education program approvals.

Otherwise, the role of the VA is that of administering the approval program: at the Central Office executing contracts with SAAs and at the regional offices processing institutions' program documents, maintaining student and institution files, paying education benefits to eligible persons, and monitoring student records at the institutions.

SUMMARY

There were 223,587 trainees reported by the regional offices to be attending education and training facilities in 1987. A mere 1.6 percent of all the trainees were involved in apprenticeship and OJT programs; of the remaining 98.4 percent, the trainees were enrolled in IHLs rather than NCD programs at the rate of nearly 15 to 1. This can be expected to continue with the bulk of Montgomery GI Bill participants enrolling in IHLs.

On average, there are about 46 veteran students per IHL program. There are about 12 veteran students per NCD program. This is in great contrast to the less than 2 trainees per site that exists for apprenticeship and OJT programs.

In the 50 states there are 129 offices involved in the approval process for veteran education; 72 of these are SAA offices and 57 are VA offices. Sixty-five percent of all SAA offices are organizationally placed in the education division of their state's structure, 22 percent are in the state labor department, and 13 percent are in a state division for veteran affairs.

On average, the SAA professional has 17.2 years and the VA professional has 15.8 years formal education.

That IHL and NCD institutions are licensed by the state and/or accredited is viewed by the VA and SAA program professionals as providing safeguards to the veteran student that the education provided gives value for the trainees' time and the public's money.

There is automated data processing equipment currently available to education program approval professionals which would permit electronic sharing of information; in 1987 at least half of all the VA and SAA offices have IBM or IBM-compatible equipment available, yet the policies and procedures are not in place to effect the electronic exchange.

ANALYSIS OF THE EDUCATION PROGRAM APPROVAL PROCESS:

A PROGRAM EVALUATION

III. TIME AND ASSOCIATED COST FACTORS

PURPOSE AND LIMITATIONS

This chapter addresses the second objective of the study: to determine the time involved in the overall process of approving education programs for veteran students and to associate costs with the activities which comprise the process.

The rigors of a formal cost analysis were not applied to this study; therefore, appropriate caution must be observed in interpreting the cost estimates associated with phases or activities presented. The intent of this chapter is to provide state and Federal policy makers and program managers with relative figures for planning purposes. The extrapolations are made from time estimates provided by experienced Veterans Administration (VA) and State Approving Agency (SAA) professionals. Cost figures include personal services figures only. Although other benefits often account for an additional thirty percent, no attempt has been made to examine state budgets to obtain overhead or miscellaneous costs. Neither tangible nor intangible benefits are presented.

PHASES OF THE APPROVAL/PAYMENT PROCESS

Regulations, promulgated by the VA to implement 38 U.S.C. chapter 36, provide for the definite duties, functions, and responsibilities conferred upon the SAAs and the VA. In the previous chapter, the general responsibilities of both the VA and the SAAs were provided.

To assist in the data collection and analysis portions of this evaluation, the activities have been arranged sequentially without regard to which entity performs the activity and as if no prior program approval exists. Only those activities performed by the VA or the SAA are included in this scheme, though a number of other entities (for example, Regional Accrediting Agencies, the

Bureau of Apprenticeship and Training, and school officials) have roles in the overall education approval process. The following general categories of activities provide a framework for the time and associated costs presented in this chapter. The thirteen phases used in this study are:

EDUCATION PROGRAM APPROVAL/PAYMENT PROCESS

NO.	ACTIVITY
1	Facility contacts SAA
2	SAA visits facility
3	SAA forwards documents to VA
4	VA: Education Services Unit (ESU) reviews documents
5	VA: ESU notifies all holders of approval information
6	Facility sends student forms to VA
7	VA: Adjudication confirms student approval status
8	VA: Adjudication enters award into system
9	VA: computer generates check for student
10	SAA conducts annual supervisory visit
11	VA: ESU conducts selected compliance survey visit
12	VA: ESU refers approval deficiencies to SAA for correction
13	SAA notifies VA of corrective action, if any

TIME FOR SELECTED ACTIVITIES

VA and SAA respondents to the survey questionnaires were asked to isolate the time spent performing specific tasks; that time is reported under this heading, Time for Selected Activities. The figures presented in the next section, Overall Process Time, include time spent for approval documents in transit between VA, SAA, and/or facility, adjudication of education claims, travel time, and other "dead" time.

VA Units

The VA professionals have self-reported the following average times for accomplishing activities. The tables which follow differentiate between types of programs, although in most cases the numbers vary little between the two types of academic institutions: institutes of higher learning (IHL) and non-college degree (NCD). The apprenticeship (APP) and on-the-job training (OJT) programs are reported together.

The VA program officials in the education services unit (ESU) were instructed to exclude travel and in-office preparation time when reporting the time it takes to conduct compliance survey visits; however, the two-day figures reported below appear high for compliance surveys considering that, as reported in Chapter II, the average number of students at an IHL was 46 and at an NCD was 12. Likewise, a full day for a compliance survey at apprenticeship and OJT sites, where the average number of trainees was slightly under two per site, seems high. These figures may include travel and preparation time.

TABLE III-1
TIME FOR SELECTED VA ACTIVITIES BY TYPE OF INSTITUTION
(in hours)

ACTIVITY	IHL	NCD	APP/OJT
ESU Reviews Documents	2.3	2.6	1.4
ESU Notification of Approval	4.1	4.1	2.1
ESU Conducts Compliance Survey	15.0	14.0	6.9
ESU Refers Deficiencies to SAA	9.8	9.8	8.2

The activities performed by the Adjudication Division in the VA's regional offices are not reported because the involvement of this staff is minimal in terms of time spent performing activities related to this study.

SAA Units

As in the case with the VA professionals, the figures for the time spent on selected activities presented in the table below have been provided by the respondents and represent the experienced judgment of the SAA professionals surveyed. The paperwork associated with the site visits, on average, takes more time than does the actual visit. The average time spent on similar activities requires greater time for IHL and NCD facilities than for apprenticeship and OJT sites; this fact may be attributed to the higher veteran enrollee density at academic institutions.

TABLE III-2
TIME FOR SELECTED SAA ACTIVITIES BY TYPE OF INSTITUTION
(in hours)

ACTIVITY	IHL	NCD	APP/OJT
Initial Visit to Facility	6.0	5.8	5.8
Document Preparation & Forwarding	7.0	7.1	5.3
Annual Supervisory Visit	6.1	5.5	4.5
Notify VA of Corrective Actions	7.8	8.6	8.4

OVERALL PROCESS TIME

The total time for a multi-step process is always greater than the sum of the individual activities which make up the process. Further, for a procedure that involves multiple sites, uses numerous reporting structures, and serves a variety of masters, it is expected that it will take time for each of the separate entities to administer the transfer of information. In this section of the report, the data presented represent the time between phases of the process inclusive of delays of any variety.

Time Between Selected Phases

As is shown in the table below, it takes approximately six and one-third weeks between the time the facility sends the VA the student forms and when the computer generates a check. Half of that time is spent in actual processing and "dead" time at the regional office and the rest is attributed to waiting for the monthly cycle of check generation. On average, it takes about a month for the SAA to visit a facility after initial contact. It takes slightly more than a month, on average, for the SAA to respond to a VA notification of an approval deficiency and to report back to the VA the action taken. The table below lists the average time it takes between selected activities or events as viewed by the VA and SAA professionals.

TABLE III-3
TIME BETWEEN SELECTED ACTIVITIES BY TYPE OF INSTITUTION
(in workdays)

ACTIVITY	IHL	NCD	APP/OJT
VA:			
Between Phase 3 & Phase 4	9.8	9.5	6.4
Between Phase 3 & Phase 5	15.7	15.3	10.5
Between Phase 3 & Phase 9	44.9	48.4	44.9
Between Phase 6 & Phase 7	14.6	15.6	14.3
Between Phase 6 & Phase 9	29.8	33.1	31.9
Between Phase 12 & Phase 13	33.1	34.1	31.3
SAA:			
Between Phase 1 & Phase 3	22.3	22.8	20.1
Between Phase 3 & Phase 9	47.5	49.1	41.6
Between Phase 12 & Phase 13	25.1	24.9	23.5

There are two categories where the professionals from the VA and the SAA were asked to provide figures for the same phases: between phases 3 & 9 and between phases 12 & 13. The first time period is the time between the SAA forwarding the approval documents to the VA and the time the student receives his first check; the second is the time between the VA referring approval discrepancies to the SAA and the time the SAA notifies the VA that corrective action has been taken. Part of the time difference from date of approval of a course to the date the student receives benefits may be solely the result of the fact that the course begins actual classes after approval has been granted. As shown in Table III-3, there is little discrepancy in the views of the two groups regarding the time it takes a student to receive benefits -- approximately nine weeks. However, the VA professionals report a greater lag between the notification and resolution of discrepancies than do the SAA professionals. The 2-workday difference in reporting could possibly be attributed to transit time.

Cumulative

By combining the responses from the two respondent groups, a picture emerges (see Table III-4) of the overall cumulative time involved in the education approval process. The approval process begins phase 1, with the facility's contacting the SAA; there is no time associated with this activity.

TABLE III-4
CUMULATIVE TIME BETWEEN ACTIVITIES BY TYPE OF INSTITUTION
(in workdays)

ACTIVITY	IHL	NCD	APP/OJT
Phase 2	0.8	0.7	0.7
Between Phase 2 & Phase 3	21.5	22.1	19.4
Phase 3	0.9	0.9	0.9
Between Phase 3 & Phase 4	9.8	9.5	6.4
Phase 4	0.3	0.3	0.2
Between Phase 4 & Phase 5	5.9	5.8	4.1
Phase 5	0.5	0.5	0.3
Between Phase 6 & Phase 7	14.6	15.6	14.3
Phase 7	0.3	0.3	0.3
Between Phase 7 & Phase 9	15.2	17.5	17.6
TOTAL	69.8	73.2	64.2
Phase 10	0.8	0.7	0.6
Phase 11	1.9	1.7	0.9
Phase 12	1.2	1.2	1.0
Between Phase 12 & Phase 13	29.1	29.5	27.4

Two activities (SAA's annual supervisory visit and VA's compliance survey visit) were placed in the list of activities at phase 10 and phase 11 although these site visits may occur at any time during the process. The time associated with these activities is not included in the cumulative total because these activities, though critical, are not part of the approval process per se.

The total approval/payment process is seen as the time between the initial inquiry from the facility to the SAA and the VA issues an education benefit check to the veteran trainee, the sum of time spent in each phase and the time between phases (for phases one through nine). The average approval/payment for an IHL or an NCD takes 14 weeks; an apprenticeship/OJT approval/payment takes a little under 13 weeks.

COST OF PROFESSIONALS

For this study only the direct payment to the employee is included.

Veterans Administration

For the federal employees, salary was calculated using the FY 1987 Federal salary table for the median grade and step for the ELR(s) at each regional office. Thus, the average salary for an ELR in FY 1987 was $32,371. There were 53.5 ELRs assigned in fiscal year 1987 who were paid a total of $1.7 million in salaries.

State Approving Agencies

To determine the salary of the SAA employee, a median was taken for those 66 SAA offices responding to the questionnaire. During fiscal year 1987, the average salary was $35,880 for the SAA professional. The contracts with the VA (for all SAAs whether or not they responded to the survey) awarded $9.3 million for FY 1987; the number of SAA professionals utilized for that period totaled approximately 180 and were paid approximately $6.4 million in salaries. The regional variation is presented later in this chapter in Table III-6.

EXTRAPOLATED COSTS OF ACTIVITIES

Associating the activities for which data was collected with the average salary for the responsible organization results in the extrapolated costs for the activities given in the table below. Not only are the IHL and NCD program approvals more expensive, on average, than the apprenticeship/OJT program approvals, but there are about 6,598 IHL and NCD programs compared to 1,973 apprenticeship and OJT programs. The figures in the table below must be read as relative indicators of the partial cost of each activity since no attempt has been made to include overhead costs or indirect employee costs. In addition, the time spent on activities are approximate and have been averaged across the system.

TABLE III-5
COSTS PER ACTIVITY BY TYPE OF INSTITUTION
(in dollars)

ACTIVITY	ORG	IHL	NCD	APP/OJT
Phase 2	SAA	$103.50	$100.44	$99.53
Phase 3	SAA	120.33	122.67	91.78
Phase 4	VA	36.26	40.54	21.39
Phase 5	VA	63.50	63.64	32.42
Phase 10	SAA	104.41	93.82	77.36
Phase 11	VA	233.19	216.46	107.75
Phase 12	VA	152.65	152.37	128.16
Phase 13	SAA	134.42	148.26	145.19
	TOTAL	$948.26	$938.20	$703.58

Of the IHL program approval process phases, the most costly activity is Phase 11, the VA's compliance survey; the most expensive activity for the apprenticeship and OJT programs is Phase 13, SAA's correction of deficiencies.

Single vs. Multiple SAAs

Approvals cost more than the time it takes a professional to complete a series of activities. The VA and each SAA negotiate a contract for the reimbursement of salary, fringe benefits, travel, and subcontract expenses as well as the payment of an administrative expense allowance each year. Since the inception of the SAA program, there have been some changes in the patterns of program participation and several iterations of the education benefit program. Between 1979 and 1987, ten states have reduced the number of SAA offices. Six states cut back the number of SAA offices from two to one; three from three to two; and one from three to one. Yet, in a few states, the established mechanisms and organisational structures for approving and disapproving education programs have not changed.

TABLE III-6
PROFESSIONALS EMPLOYED AND NUMBER OF APPROVALS/DISAPPROVALS

OFFICE SIZE	TOTAL FY 1987 PROFESSIONALS	FY 1985 ACTIONS	FY 1986 ACTIONS	FY 1987 ACTIONS	ACTIONS/ PROF FY87
Less than 1	5.35	353	360	353	66
One	28.64	2,134	2,561	2,440	85
Two	20.50	2,875	1,848	2,276	111
Three	34.50	5,220	6,869	6,628	192
Four	8.00	3,399	3,565	3,783	473
Five	15.25	2,929	2,439	2,124	139
More than 5	61.50	12,672	12,755	13,710	223
TOTAL	173.74	29,582	30,397	31,314	

In Table III-6 above, the measure of activity is the number of approvals and disapprovals reported by each SAA for each of the past three years; SAAs are grouped by the number of professionals on staff in 1987. For the purpose of looking at the data in this section of the analysis only, it is assumed that all approvals are equal, that is, that an average OJT approval is equivalent to an average NCD approval. It can be seen that in FY 1987, the offices with four to five professionals, using this measure alone, were the most productive.

TABLE III-7
PROFESSIONALS EMPLOYED AND NUMBER OF SAAs PER STATE

NUMBER OF PROFESSIONALS	NUMBER OF SAAs PER STATE ONE	TWO	TOTAL
Less than 1	2	7	12
One	11	14	25
Two	5	5	10
Three	7	4	11
Four	0	2	2
Five	3	0	3
More than 5	5	1	6
TOTAL	33	33	66

Table III-7 above shows the number of professionals employed per SAA, indicating where there are multiple SAAs in a state. There are two SAAs where less than one full-time professional is utilized in the entire state. The high incidence (21) of very small (one-or-less full-time professionals) SAAs in states where there are multiple SAAs points to areas where savings in administrative costs might be accomplished by sharing clerical and administrative staff as well as computer and office equipment.

CONTRACT COSTS

Within the VA Central Office in Washington, D.C., there is a group of professionals whose job it is, among other responsibilities, to negotiate and monitor contracts with the SAAs. This staff, Education Central Office Operations (ECOO), interacts directly with SAA professionals and ELRs. The staff provides education program direction to the regional office Education Services Unit (ESU); however the ECOO has no direct line authority over the ESUs. ECOO is part of Education Operations within the Vocational Rehabilitation and Education Service of the Department of Veterans Benefits and currently employs a staff of one clerical support person, four program analysts, and one Chief.

Geographic Distribution

For the purpose of this analysis, because the work of the Central Office Operations staff is not strictly divided along regional lines, the division used by the National Association of State Approving Agencies (NASAA) will be employed to discuss some regional variations found during data collection.

The regions used by NASAA are Central, East, South, and West. For a detailed list of the states which belong to each region, please refer to Appendix B, Table B-1. The table below uses the NASAA regions. Data for the number of professionals are missing for the six non-responding SAAs; however contract costs represent the actual amount for all 72 SAAs.

TABLE III-8
REGIONAL DISTRIBUTION OF COSTS AND NUMBER OF PROFESSIONALS, 1987
(in million dollars)

REGION	CONTRACT COST	NUMBER OF PROFESSIONALS
Central	$2.18	47.25
Eastern	2.41	41.90
Southern	2.63	46.89
Western	2.08	37.70
TOTAL	$9.30	173.74

As is seen in the table, the region with the largest amount of contract dollars is the southern region. Size, as determined by the number of professionals, shows that the regions are about equally manned. The SAAs which did not submit data are geographically dispersed and would not alter the pattern shown in Table III-8.

Compared to Number of Program Approvals & Disapprovals

A useful way to view the activity level and the associated costs is to again use the regional designation of SAAs to examine whether the density of approval/disapproval activity is greater in one region than in others and to associate numbers of professionals and their costs to the activity level; all types of program approvals/disapprovals (A/D) are added together in this section. The table below depicts these relationships. The larger volume of approval and disapprovals reported in the eastern region bring the unit cost below the national average of $297 per approval/disapproval action.

TABLE III-9
REGIONAL DISTRIBUTION OF APPROVALS/DISAPPROVALS, 1987

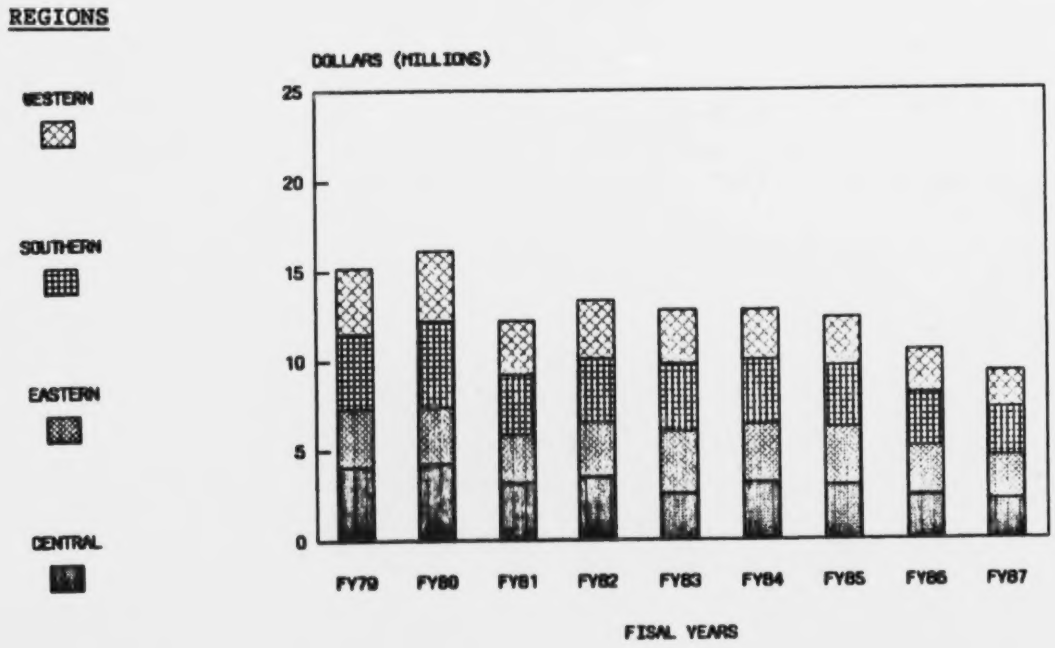
REGION	APP/DISAPP NUMBER	CONTRACT COST	COST PER A/D ACTION
Central	6,124	$2.18 m	$356
Eastern	13,169	2.41 m	183
Southern	8,626	2.63 m	305
Western	3,392	2.08 m	613
Nationwide	31,311	$9.30 m	$297

Trends FY 1979-1987

The ECOO staff has provided the following contract obligation figures covering fiscal years 1979 through 1987. These figures represent the amounts obligated for SAA contracts. The bar graph below illustrates the relative change in the contract amounts over the last eight years.

EXHIBIT III-1
REGIONAL DISTRIBUTION OF CONTRACT OBLIGATIONS, 1979-1987

(in million dollars)



Portion of VA Contractual Activities Funded

When queried as to the extent that the VA provides funding for SAA staff for VA contractual activities, more than 42 percent responded that the VA funds 100 percent of the VA contractual activities. Another 35 per cent reported that the VA funding covered at least 75 percent of the contractual activities. Only 23 percent reported that the VA pays less than 75 percent of the actual costs.

This is in contrast to the list of expense items which were reported as being paid from state funds. Table III-10 below shows the number and percent of SAAs that responded in the affirmative when asked if the state funds the expense item. The total public cost of an SAA office includes both VA and state costs.

TABLE III-10
EXPENSE ITEMS PAID FROM STATE FUNDS

ITEM	NUMBER	PERCENT
Rental of SAA Office Space	37	56.1
Other Office Equipment	37	56.1
Paper and Supplies	36	54.5
Heating and Cooling of SAA Offices	36	54.5
Telephone Bills	35	53.0
Computer Support	35	53.0
Cost of Utilities	34	51.5
Clerical Support	22	33.3
Use of State Automobiles	16	24.2
Other	16	24.2

A third question was posed: If any part of the VA contractual work is subsidized by the state, provide the dollar amount of the subsidy for the past three Federal fiscal years. The responses provided to this question indicated that few SAAs were able to supply accurate figures. The results of data collected are inconclusive and contradictory.

SUMMARY

The combined direct salary cost of the VA and SAA professionals associated with the veteran education approval process in FY 1987 was approximately $8 million.

The activity for which the SAA professionals indicate they spend the greatest amount of time was in making supervisory and inspection visits (34.4 percent of total time) with approvals/disapprovals taking another 15.4 percent; the VA professionals spent most of their time, in a week that does not involve travel, in reviewing IHL/NCD documents (including catalogs).

The region which performs the greatest number of approvals and disapprovals is the Eastern one; yet the contract costs in FY 1987 were about $220,000 less in the Eastern region than in the Southern region where the contract costs were highest.

ANALYSIS OF THE EDUCATION PROGRAM APPROVAL PROCESS:
A PROGRAM EVALUATION

IV. DESCRIPTION OF THE DEPARTMENT OF LABOR BUREAU OF APPRENTICESHIP AND TRAINING

PURPOSE

This chapter discusses the Department of Labor's (DOL) Bureau of Apprenticeship and Training (BAT) and describes the process used to qualify and register apprenticeship programs and sponsors.

This discussion includes a brief history of apprenticeship training programs, the national distribution of BAT representatives, the criteria for qualifying for DOL program registration, and the process used by the BAT staff in approving program sponsors and programs.

SCOPE AND METHODOLOGY OF REVIEW

A review of DOL's BAT is included because of its interrelationship with the VA by serving veterans in two distinctive areas under title 38. Chapter 41, section 2002A, establishes an Assistant Secretary of Labor for Veterans' Employment whose principle responsibility is to formulate and implement DOL policies and procedures to carry out employment, unemployment, and training programs to the extent that they affect veterans. The second area in which the VA interacts with DOL is described in chapter 36, section 1787, which establishes that eligible veterans are to be paid a training assistance allowance while pursuing a full-time program of apprenticeship if it meets the standards published by the Secretary of Labor pursuant to section 50a of title 29 and is approved by the State Approving Agency.

Data gathering has been accomplished through personal interviews with BAT representatives, research of related public laws, and review of information on apprenticeship programs that has been prepared for and distributed by DOL.

BACKGROUND

Historical Perspective

As part of the Smith-Hughes Act (39 Statute 929), enacted February 23, 1917, the National Youth Administration was given the responsibility of formulating labor standards necessary to safeguard the welfare of apprentices and cooperating with states in promotion of these standards. This responsibility was moved to the Secretary of Labor when the National Apprenticeship Act, (Public Law 308), was enacted by Congress on August 16, 1937. Also referred to as the Fitzgerald Act, the passage of this legislation marked the formal entrance of the Federal government into nationwide promotion of apprenticeship in industry.

The intent of the National Apprenticeship Act is the promotion of the concept that apprenticeship systems should be established and conducted on a voluntary basis by labor and management with promotional and technical assistance provided by the BAT staff.

Under the National Apprenticeship Act, BAT is responsible for providing service to existing apprenticeship programs and technical assistance to organizations which would like to establish apprenticeship programs. The BAT staff members work very closely with State Apprenticeship Councils (SAC) and the educational system to deliver support services at the National, state, and local levels.

Current Perspective

It has become common practice to include provision for apprenticeship and OJT training programs in negotiated labor contracts. The BAT's National Apprenticeship Program is used to describe the coalition of management, labor, and government that supports apprenticeship and OJT programs.

Apprenticeship and OJT programs are operated either singly by employers and employer associations or jointly by management and labor on a voluntary basis. BAT is responsible for providing service to existing programs and for stimulating the development of additional programs.

Application for, and participation in, apprenticeship and OJT programs by title 38 beneficiaries has declined 90 percent from 1980 through 1987. With social emphasis on earning an academic degree, there has been a deemphasis on learning trades and trade skills. Additionally, title 38 benefits provide more advantages for a full-time student in an institute of higher learning. Benefit rates paid to a title 38 trainee in an apprenticeship or OJT program are lower than benefits received by a full-time student at an institute of higher learning; however this is somewhat offset by the trainee wages paid by the employer.

The Montgomery GI Bill-Active Duty (Public Law 99-576), effective October 28, 1986, includes new programs for veterans to receive benefits for apprenticeship and other on-the-job training. According to DOL program forecasts, which are based on increases in employment throughout the Nation, it is anticipated that participation in these programs will increase.

THE BUREAU OF APPRENTICESHIP AND TRAINING

Organization of BAT

The BAT national headquarters staff is located in Washington, D.C., in the DOL building. The staff reports to the Assistant Secretary of Employment and Training who is directly responsible to the Secretary of Labor.

The organizational relationships are described in the following modified organization chart. A horizontal format is being used; however, these offices report in a vertical direction.

EXHIBIT IV-1
DOL CONDENSED ORGANIZATION CHART

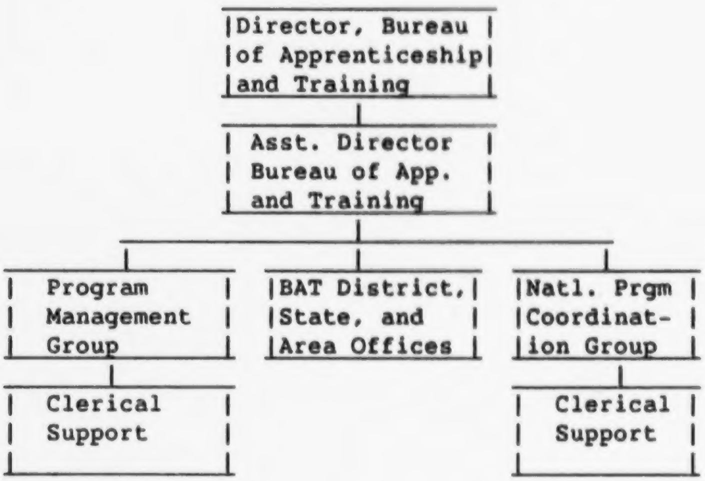
Secretary of Labor	__	Asst. Sec. for Employment and Training	__	Employment and Trng. Administration	__	Bureau of Apprenticeship and Training	__	BAT District, State, and Area Offices

BAT Staff

The national staff consists of a Director and Assistant Director who are responsible for eight program professionals and two clerical support staff serving in the Program Management Group and five program professionals and one clerical support person serving in the National Program Coordination and Training Group. These program groups work interactively with BAT district offices in establishing policies and procedures and in promoting national apprenticeship programs.

The working relationships of the groups are described in the following organization chart.

EXHIBIT IV-2
BAT ORGANIZATION CHART


Director, Bureau of Apprenticeship and Training
Asst. Director Bureau of App. and Training
Program Management Group
BAT District, State, and Area Offices
Natl. Prgm Coordination Group
Clerical Support
Clerical Support

Purpose of BAT

The primary purpose of DOL's BAT staff is to provide service in the development and registration of qualified apprenticeship programs.

BAT has two primary functions: to provide professional service to existing program sponsors and to expand the use of the apprenticeship system by assisting potential sponsors to design, implement, and operate apprenticeship programs.

The BAT staff is authorized and directed to formulate and promote labor standards necessary to safeguard the welfare of apprentices, to encourage inclusion of these standards in contracts of apprenticeship, to bring together employers and labor for the formulation of programs of apprenticeship, to cooperate with state agencies engaged in the formulation and promotion of standards of apprenticeship, and to cooperate with the Secretary of Education in developing vocational education programs.

The BAT staff provides technical assistance to industry through analysis of training program content and work process development, development of selection procedures consistent with the Equal Employment Opportunity in Apprenticeship and Training regulation (title 29 CFR part 30), and development of administrative procedures to insure that Apprenticeship Programs Labor Standards for Registration are included in the program design (title 29 CFR part 29). As called for in the Vocational Education Act of 1963, the BAT, in cooperation with the Department of Education (DOE) and program sponsors, develops related technical instruction curricula and program evaluations. BAT also develops forecasts of apprenticeship needs, indentures apprentices, issues completion certificates, and assists veterans in applying for apprenticeship programs and VA benefits.

SCOPE OF OPERATIONS

Program Size

In FY 1987, the 92 BAT offices served 43,163 programs and 294,519 trainees. Each program sponsor and each trainee is reviewed at least once each year. The BAT had an FY 1987 budget of $13,029,000.

In 1987 there were over 800 recognized apprenticeable occupations. New occupations are approved to keep pace with technological advances.

Apprenticeship programs are a type of on-the-job training. A primary requirement which differentiates between apprenticeship and other OJT is that apprenticeship programs specifically require 2,000 hours of on-the-job training and 144 hours of classroom training.

Areas of Operations

The BAT national staff is responsible for 10 regional offices, 50 state offices, and 32 State & Territorial Apprenticeship Agencies (area offices). Each of the BAT regional offices serves from four to eight states and territories. Hence, regions are comprised of state and area offices with support staffs needed to accomplish the BAT's mission throughout the Nation. (See Table C-1 in Appendix C for a list of BAT regions.)

The BAT regional offices direct and coordinate the state and area offices. The regional offices answer to the Secretary of Labor through the BAT National Office.

The directors of BAT state offices coordinate formal apprenticeship training programs and promote apprenticeship and training programs.

An area office is staffed by one or more field representatives. These offices are generally located away from the state office in order to provide the greatest distribution of BAT representatives. Area offices are directed by the BAT State Director.

Table IV-1 displays the distribution of BAT representatives by region and type of BAT office (state or area) in which they are located and the total number of staff in each region.

TABLE IV-1

DISTRIBUTION OF BAT OFFICES

REGION	I	II	III	IV	V	VI	VII	VIII	IX	X	NATIONAL TOTAL
Region Staff	16	18	29	31	51	22	19	14	16	15	231
State Offices	6	2	5	8	6	5	4	6	4	4	50
Area Offices	2	5	7	12	24	8	4	1	5	3	71

STANDARDS FOR PROGRAM APPROVAL

To be eligible for approval and registration, an apprenticeship program sponsor must provide an organized, written plan containing the terms and conditions of employment, training, and supervision of apprentice(s) in the apprenticeable occupation. An apprenticeship program must contain the 22 DOL standards as established in title 29, section 50. (See Exhibit C-1 in Appendix C.) In the paragraphs below, selected sections of the apprenticeship plan are discussed.

Terms and Conditions of Employment

This section of the plan identifies the minimum qualification requirements for employment in an apprentice program, such as the minimum age and the physical and mental ability needed to work in the trade or skill. Included in this section are the terms for on-the-job training in the skill or trade, the requirements for formal training, and a provision for periodic review and evaluation of the apprentice's progress which the sponsor is required to maintain.

The terms and conditions for employment provide a reasonable probationary period as well as the authority for granting termination of the apprenticeship agreement during the probationary period. Should the sponsor not be able to fulfill the obligation to the apprentice, there must be a provision for transferring the training obligation to another sponsor.

Training

The sponsor provides a program training plan which assures appropriate job placement of an apprentice under a written apprenticeship agreement and that the employment and training of an apprentice is in a skilled trade. This plan outlines a schedule of supervised work experience and on-the-job training of which not less than 2,000 hours and a minimum of 144 hours per year of supplemental instruction in technical subjects related to the trade.

There must be adequate and safe equipment and facilities for training and supervision as well as safety training for apprentices while on the job and during related instruction. There must also be assurance of qualified training personnel and adequate supervision on the job as well as a method for granting recognition for successful completion of apprenticeship training as evidenced by an appropriate certificate.

Supervision of the Apprentice

The program sponsor must document a numeric ratio of apprentices to journeymen consistent with proper supervision, training, safety, and continuity of employment. In conjunction with the training and supervision of the apprentice, the sponsor must establish and maintain a record for each apprentice detailing work and training progress throughout the duration of the apprenticeship training program.

THE PROCESS FOR REGISTRATION/APPROVAL OF APPRENTICESHIP PROGRAMS

The primary purpose of the BAT staff is to develop high quality, safe trade and skills training programs which impart nationally uniform knowledge of a specified trade or skill. This is accomplished through BAT's standardized descriptions of a trade or skill and by on-the-job training schedules and levels of instruction necessary to develop an apprentice to a full level of competence within the industry.

The DOL Approval Process in SAC States

The BAT staff works very closely with both apprenticeship program sponsors and State Apprenticeship Committees/Commissions (SAC). Twenty-six states have granted the authority to approve apprenticeship and OJT programs to SAC. In these states, BAT representatives work with the program sponsor to develop the apprenticeship program, the apprenticeship agreement, and submission of the program package to the SAC for approval. When SAC approves the package, it is returned to the BAT office. A BAT representative works with the program sponsor to recruit trainees, monitor the program, review and evaluate the trainees' progress, and issue a certificate when the apprentice has completed the program. BAT representatives report that a SAC program approval may take as little as one week or as long as one year to gain approval.

The DOL Approval Process in BAT States

In the remaining 24 non-SAC states, DOL approval authority has been given to the BAT state office. BAT representatives work with the program sponsors just as they do in SAC states. However, once the program package has been completely developed and meets DOL standards of apprenticeship, recruitment and training can commence. No further approval is required. Implementation of an apprenticeship or OJT program is delayed only by the length of time it takes to develop the program.

EXHIBIT IV-3

BAT's ACTIVITY FLOW

```
 ________________    ________________    _________________    _______________    _________________
| BAT rep &     |   |BAT &/or SAC|   |Complete       |   |Apprentice   |   |BAT reps       |
| program's     |   |review        |   |program pkg    |   |and sponsor|   |monitor prgm|
| sponsor       |   |sponsor and   |   |forwarded      |   |sign         |   |until          |
| develop       |__|plan for      |__|to BAT Natl   |__|apprentice   |__|certificate    |
| apprentice|   |compliance    |   |Office for     |   |agreement    |   |awarded to     |
|_program_______|   |and approval|   |registration|   |_____________|   |apprentice_____|
```

SUMMARY

The BAT's efforts to promote and develop apprenticeship and OJT programs have resulted in 43,163 programs in which 294,519 trainees were enrolled in FY 1987. These programs are administered from 92 offices and had a total staff of 231 with a budget of $13,029,000 for FY 1987. On average, each BAT representative is responsible for 187 programs at an average cost of $302 per program for FY 1987. The average number of trainees per staff is 1,275 at an average cost per trainee of $44.

A BAT representative reviews the apprenticed program on a recurring basis to insure that all terms of the apprenticeship agreement are met by both the apprentice and the sponsor, that appropriate progress records are maintained for each apprentice, that the work and training environment are safe, and that appropriate equipment is available.

It is the responsibility of the BAT representative to report apprenticeship programs which are not maintaining compliance with the labor standards established in the apprenticeship agreement. Action by BAT could lead to disapproval and deregistration of the sponsor and the sponsor's apprentice programs.

ANALYSIS OF THE EDUCATION PROGRAM APPROVAL PROCESS: A PROGRAM EVALUATION

V. DESCRIPTION OF THE DEPARTMENT OF EDUCATION ACCREDITING AGENCY EVALUATION PROCESS

PURPOSE

The purpose of this chapter is to discuss the Department of Education's (DOE) Accrediting Agencies Evaluation Staff (AAES) by describing the process of nationally recognizing accrediting agencies, associations, and commissions.

DOE is the Federal agency cited in title 38, chapter 36, section 1775, as having responsibility for certifying which accrediting bodies are nationally recognized. Specifically, the Secretary of Education is required to publish a list of nationally recognized accrediting agencies and associations (List). Inclusion on the List confers a certain status upon the accrediting body and confirms that DOE has accepted the accrediting body as being capable of assessing the quality of education offered by educational institutions within its jurisdiction. Each accrediting body is independent of the Government and has responsibility for its accreditation standards and for the accreditation process for institutions within its jurisdiction.

SCOPE AND METHODOLOGY OF REVIEW

Scope

This discussion includes a brief history of the responsibility placed with the Secretary of Education to establish criteria for certifying accrediting bodies as nationally recognized, to evaluate each accrediting body on the basis of quality of compliance, and to publish a list of nationally recognized accrediting agencies and associations as mandated by Public Law 88-126.

Also included in this discussion will be a description of the procedures for petitioning to the Secretary of Education for national recognition, the process employed by the AAES staff in evaluating a petitioner, and the steps taken by DOE in granting or denying recognition.

For the purpose of this study, only material directly related to title 38 mandates (and references to corresponding laws) is included.

Methodology

Information for this chapter was collected through personal interviews with the AAES Director, the Chief of the AAES staff, and members of the AAES staff. A review was conducted of publications, DOE policy statements, DOE guidelines, and laws related to accreditation and the process of gaining national recognition.

Representatives of DOE's Office of Higher Education Programs were contacted for information as to which of the offices in DOE would be able to provide information most closely related to the VA's study of State Approving Agencies (SAA). According to DOE representatives, the AAES of DOE is the most closely related to the SAA function because there are similarities in processes and because both the AAES and SAA are mandated in title 38, chapter 36 to insure quality education.

BACKGROUND

Historical Perspective

In 1952 the Veterans Readjustment Assistance Act, otherwise known as the GI Bill, was enacted by Congress. One of the issues aired during the Congressional hearings in the development of the GI Bill was the fraud and abuses of educational benefits that had occurred under the World War II veterans' education benefit program. During the hearings, spokesmen for education associations gave their support to the idea of using the "...accrediting bodies for the purpose of identifying educational institutions of quality and legitimacy" (Proffitt, 145). Thus, one of the provisions of the GI Bill authorized the Secretary of Education to grant formal Federal recognition to accrediting bodies and to publish a list of nationally-recognized agencies.

In June 1987, the Secretary of Education published a listing of 115 nationally recognized accrediting agencies, associations, and commissions. Four additional accrediting bodies were added in September 1987, for a new total of 119. The number of accrediting agencies and associations is expected to increase to accommodate the number of schools and programs gearing up to teach new technology and communications curricula. Each of these new schools of higher technology will require new, specialized accreditation to insure quality and reputability.

Approximately 7,500 institutions, schools, programs, and curricula have been accredited by the 119 accrediting bodies.

THE ACCREDITING AGENCY EVALUATION STAFF

Organization of AAES

The evaluation of the agency or association involved in the accreditation process is the function of the AAES which was established to deal with accreditation matters.

The organizational relationships are described in the following modified organization chart. A horizontal format is being used; however, these offices report in a vertical direction.

EXHIBIT V-1
DOE CONDENSED ORGANIZATION CHART

```
 _____________     ______________     _____________     _____________     ______________
| Secretary  |    | Asst. Sec.  |    | Office of  |    | Higher Ed.|    |Accrediting  |
| of         |____| for Post-   |____| Higher Ed.|____| Program    |____|Agency Eval-|
| Education  |    | secondary   |    | Programs   |    | Mgmt.Serv.|    |uation Staff|
|____________|    |_Education___|    |____________|    |____________|    |_____________|
```

The AAES reports to the Director of Higher Education Program Management Service who reports to the Deputy Assistant Secretary of the Office of Higher Education Programs. This office reports to the Assistant Secretary for Postsecondary Education who reports to the Secretary of Education.

The AAES has the following major functions:

Functions of AAES

1. Continuous review of procedures, policies, and issues regarding DOE's interests and responsibilities related to accreditation;

2. Administration of the process whereby accrediting agencies, commissions, and associations secure initial and renewed recognition by the Secretary of Education;

3. Liaison with accrediting agencies, commissions, and associations;

4. Consultative services to institutions, associations, other Federal agencies, and Congress regarding accreditation;

5. Interpretation and dissemination of policy related to accreditation issues in the case of all appropriate programs administered by DOE;

6. Conduct and stimulation of appropriate research; and

7. Support for the Secretary's National Advisory Committee on Accreditation and Institutional Eligibility.

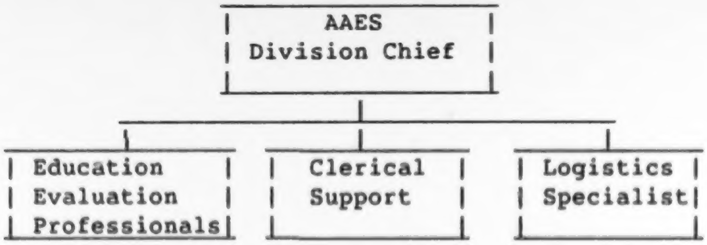
Source: U. S. Department of Education, Nationally Recognized Accrediting Agencies and Associations, p. 4.

AAES Staff

The AAES is located in Washington, D.C., and is comprised of eight people: the Division Chief, a GM-14, who has over 20 years experience in DOE; four GS-13 education evaluation professionals who have, on average, 17 years experience with DOE; a logistics specialist at the GS-11 level; a full-time clerical support person at the GS-6 level; and a part-time GS-2 clerical support person.

Their working relationships are described in the following organization chart.

EXHIBIT V-2
AAES ORGANIZATION CHART



AAES Budget

Salary costs to DOE for the AAES were $287,130 for FY 1987. Travel for the staff of four evaluation professionals is budgeted at about $10,000 per fiscal year. In addition to salaries and travel, the AAES budget also funds two meetings a year for the National Advisory Committee on Accreditation and Institutional Eligibility ($20,000 per year). This sum covers travel expense, lodging, per diem, and an honorarium of $150 for each of the 15 Committee members per meeting. The total budgeted for FY 1987 was $317,130.

SCOPE OF PROGRAMS SERVICED

In the recently published listing of Nationally Recognized Accrediting Agencies and Association (June 1987), 115 accrediting agencies, associations, and commissions were listed with an additional 4 listed in the Addendum (September 1987). This listing includes 6 regional accrediting associations, 13 regional accrediting commissions, 72 national institutional and specialized accrediting bodies, and 24 specialized accrediting bodies serving 7,500 institutions, schools, programs, and curricula. The six regional accrediting associations are listed in Appendix D.

The two basic types of educational accreditation, institutional and specialized or programmatic, are described below.

Institutional Accreditation

The term institutional accreditation indicates that each part of the institution contributes to the achievement of an institution's objectives, although not necessarily all on the same level of quality. The various commissions of the regional accrediting associations and national accrediting agencies perform institutional accreditation.

Specialized Accreditation

The term specialized accreditation is used when a unit (program, department, or school) within an institution is accredited. The unit accredited may be as large as a college or school within a university or as small as a curriculum within a discipline. Most of the specialized accreditation units are within institutions which are accredited by one of the regional accrediting commissions. Some specialized accrediting agencies review professional schools and other specialized, vocational, or other postsecondary institutions which are free-standing in their operations. In this way, a 'specialized' accrediting body may also function in the capacity of an 'institutional' accrediting body. In addition, a number of specialized accrediting agencies accredit educational programs within non-educational settings such as hospitals.

CRITERIA FOR NATIONAL RECOGNITION

An accrediting agency or association which desires to be recognized by the Secretary of Education must make application in writing. Both for initial recognition and for renewal of recognition, the accrediting agency, commission, or association must demonstrate to AAES its compliance with the criteria established for recognition.

The Secretary of Education's Procedures and Criteria for Recognition of Accrediting Agencies (Criteria) which are contained in 34 CFR part 603, subpart A, require the petitioning agency or association: (1) to provide the scope of its activities including the geographical area and the types and levels of institutions or programs covered and to have at least two years' experience with respect to the scope of activity for which it seeks recognition and (2) to demonstrate that it has the administrative personnel, procedures, and financial resources to carry out its operations in a timely and effective manner.

Personnel

A petitioning agency must be able to demonstrate that it has competent and knowledgeable persons, qualified by experience and training, to participate on visiting evaluation teams, engage in consultative services for the evaluation and accreditation process, and serve on policy and decision-making bodies. Further, it must show that it includes on each visiting evaluation team at least one person who is not a member of its policy or decision-making body or its administrative staff.

Procedures

The petitioning agency must be able to carry out its operations in a timely and effective manner. It must be able to show that it maintains clear definitions of each level of accreditation status and has clearly written procedures for granting, denying, reaffirming, revoking, and reinstating accredited status. Further, it must demonstrate that if a preaccreditation status has been developed, criteria and procedures must be related to those established for accreditation. As an integral part of the accrediting process, institutional or program self-analysis and an on-site review by a visiting team must be included. The institution's self-analysis must involve a representative portion of the institution's administrative staff, teaching faculty, students, governing body, and other appropriate constituencies and must be a qualitative assessment of the strengths and limitations of the institution or program, including the achievement of its objectives.

Financial Resources

The petitioning agency must be prepared to show its ability to provide adequate financial resources to carry out its operations. This requirement is satisfied by presenting an externally audited financial statement and a financial plan which defines fiscal needs and demonstrates the ability to manage expenditures. Included must be a schedule of fees to be charged for the accreditation process; those fees may not exceed the reasonable cost of sustaining and improving the process.

Frequency of Accrediting Reviews

Each nationally recognized accrediting agency and association must request renewal of recognition every four years. The process for renewal of recognition is the same as the process of applying for initial recognition. However, the Secretary of Education may request review of an agency or association before the end of the four-year period if reasonable question or doubt has been raised concerning that agency or association's procedures or practices.

THE PROCESS FOR ACCREDITING AGENCY OR ASSOCIATION RECOGNITION

The recognition process, as described by DOE, is presented in the paragraphs below. The six distinct phases identified are petition, submission, analysis, hearing, final decision, and extension of scope.

Petition

A petition for initial recognition or renewal of recognition consists of a narrative statement, organized on a criterion-by-criterion basis, showing how the agency or association complies with the Criteria. The narrative statement must be accompanied by clearly referenced supportive documentation including the agency's accreditation standards and procedures, a recent externally-audited financial statement, published lists of accredited schools or programs, self-evaluation guidelines, guidance materials for visiting team members, and samples of completed self-evaluations and site-visit reports.

Submission

The petition plus eight copies must be submitted to the Chief, AAES. To receive consideration, petitions must be submitted at least six months prior to the month in which petitions are scheduled for review.

Analysis

The petition review process includes analysis of the petition by professional staff of the AAES and observation of the agency or association's site-visit and decision-making activities by AAES staff or consultants. AAES staff members may also visit the petitioning accrediting agency's administrative offices to conduct interviews of agency staff and review the agency's facilities, records, and administrative operations. AAES staff members may also conduct interviews or surveys of other persons, organizations, or institutions concerning the applying agency's accreditation process in order to obtain further information relating to how the agency complies with the Criteria.

The AAES prepares a written analysis of the agency or association's petition. The staff analysis, reports of on-site observations, special survey reports, and other material pertinent to the analysis are included in the agenda material to be reviewed by the National Advisory Committee on Accreditation and Institutional Eligibility (Committee). In advance of the Committee meeting at which the petition is scheduled to be considered, the AAES provides the written staff analysis and appendices to the applicant agency and to interested third parties.

Hearing

The Committee meets at least twice a year to review petitions from accrediting agencies and associations. Usually a petition is assigned to one of two subcommittees of the Committee. Each member of the subcommittee receives one of the copies of the petition submitted by the agency or association. Each member of the Committee receives every staff analysis and appended materials.

Petitioning agencies are invited to make an oral presentation which is normally heard by the subcommittee to which their petitions are assigned. The subcommittee also hears oral presentations from the AAES and from third parties who request to be heard.

Each subcommittee reports its findings and recommendations to the full Committee which adopts final recommendations to be forwarded to the Secretary of Education for action. The Committee conducts its business in a public forum, and a transcript of the proceedings is made.

Final Decision

The Secretary of Education makes the final decision regarding recognition or renewal of recognition of an accrediting agency or association. Agencies may be granted initial recognition or renewal of recognition for a period of up to four years, depending upon their degree of compliance with the criteria. The action will include a statement of the scope of the agency's recognized activities. The Secretary of Education may also defer action concerning a petition for initial or renewal of recognition until further study of the petition is accomplished. (The petition is returned to the AAES for additional liaison work with the petitioning agency or association.) Alternately, the Secretary of Education may deny initial recognition or request a recognized accrediting agency or association to show cause as to why it should not be removed from recognized status.

The Secretary of Education's list of Nationally Recognized Accrediting Agencies and Associations is published periodically in the Federal Register. The list includes the scope of recognition of each agency or association.

Extension of Scope

The scope of an agency or association's activities is the geographical area and the types and academic levels of educational institutions and programs covered by the agency or association's accrediting activity.

A petition for an extension of scope of recognition may be included as an integral part of a petition for renewal of recognition, or it may be submitted separately. If an extension of scope is sought prior to the agency's next regularly scheduled review, agency personnel consult with the AAES concerning the petition format.

Additional Information

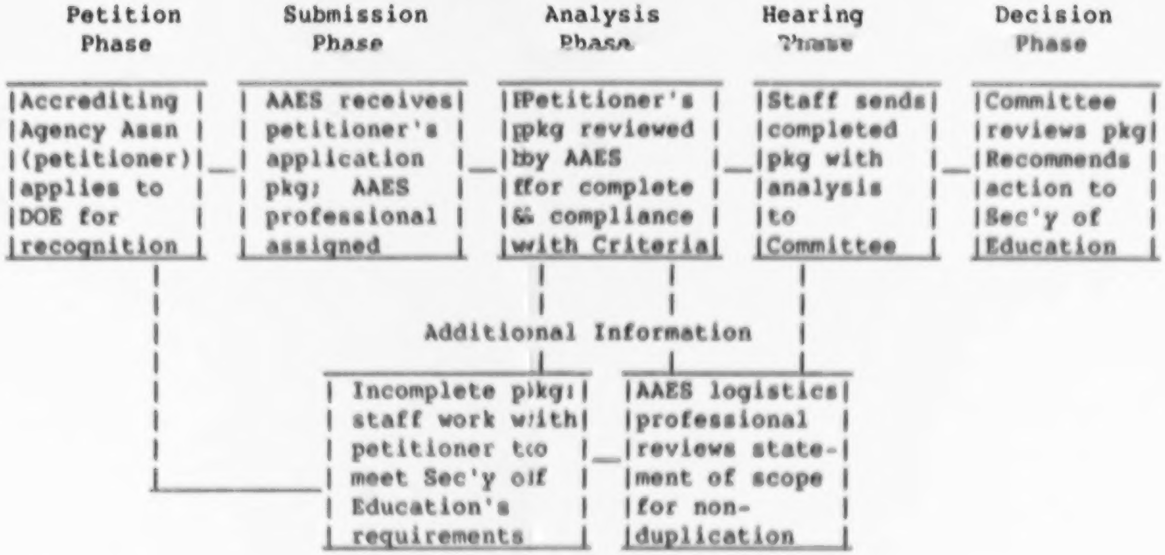
When two or more separate accrediting bodies seek recognition in the same field or in the same geographic area, both are required to demonstrate to the Secretary of Education that their accrediting activities do not unduly disrupt the affected institution or program. The Secretary of Education will not recognize more than one association or agency (1) in a defined geographical area of jurisdiction or (2) in a defined field of program specialization within secondary or postsecondary education.

Under the Secretary of Education's criteria for recognition, an agency must have had at least two years' experience in accrediting and must have gained acceptance of its criteria, methods of evaluation, and decisions by educational institutions, practitioners, licensing bodies, and employers throughout the United States before its determinations can be relied upon for Federal aid purposes. (According to Proffitt, one purpose for which its determinations are used is "to safeguard Federal education funds by insuring that they will be used only by or at institutions which are recognized as educationally reputable." The Secretary of Education's responsibility to oversee the accreditation process is intended "to provide sufficient control over the use of private accreditation decisions to prevent abuse of the system by the accrediting agencies" (153).)

Recognition Process Flow

Exhibit V-3 displays the flow of documents from the initial application to the approval or disapproval for the Secretary of Education's recognition. The process flow chart is developed to correspond with the six phases of the process for accrediting agency or association recognition in the preceding narrative. Although the section on additional information is not considered a phase, it is important particularly in complying with the Secretary of Education's criteria for non-duplication of scope of an agency or association's operations.

EXHIBIT V-3
RECOGNITION PROCESS FLOW


Petition Phase
Submission Phase
Analysis Phase
Hearing Phase
Decision Phase
Accrediting Agency Assn (petitioner) applies to DOE for recognition
AAES receives petitioner's application pkg; AAES professional assigned
Petitioner's pkg reviewed by AAES for complete & compliance with Criteria
Staff sends completed pkg with analysis to Committee
Committee reviews pkg Recommends action to Sec'y of Education
Additional Information
Incomplete pkg: staff work with petitioner to meet Sec'y of Education's requirements
AAES logistics professional reviews statement of scope for non-duplication

SUMMARY

The essential purpose of the accreditation process is to make a professional judgment as to the quality of the educational institution or its program(s) for which accreditation is being sought.

Accreditation of institutions or of an institution's programs by agencies, commissions, or associations nationally recognized by the Secretary of Education is a prerequisite for Federal financial assistance to institutions as well as to the students attending such institutions under a wide variety of programs supported by the Department of Education.

The accrediting of schools and institutions is financed through fees charged by the nationally-recognized agency or association for the services provided by them. These fees are paid by the institution or school requesting accreditation. The fee schedule is established and approved by the AAES.

ANALYSIS OF THE EDUCATION PROGRAM APPROVAL PROCESS:
A PROGRAM EVALUATION

VI. COMPARISON OF
VETERANS ADMINISTRATION - STATE APPROVING AGENCIES WITH DEPARTMENT OF LABOR'S BUREAU OF APPRENTICESHIP AND TRAINING AND DEPARTMENT OF EDUCATION'S ACCREDITING AGENCY EVALUATION STAFF PROCESSES

PURPOSE

The purpose of this chapter is to compare the approval and registration processes for apprenticeship and on-the-job training programs and the approval and the accreditation processes of institutions, schools, programs, and curricula. In earlier chapters, methods used by three Federal agencies to approve, register, or accredit institutions, schools, programs, and curricula were discussed in some detail. In this chapter discussion will focus on a comparison of like programs using various agencies' statistics for approval, registration, or accreditation.

A State Approving Agency (SAA) may approve, but is not required to give approval, where accreditation or approval from another source already exists. As mandated in chapter 36 of title 38, the SAA may approve accredited and nonaccredited education institutions and registered and unregistered training establishments.

An overview of these processes will be drawn comparing the operating statistics of each of these Federal agencies. Where practical, the discussion of this chapter is limited to the mandates set forth in title 38.

SCOPE AND METHODOLOGY OF REVIEW

Scope

The process used by SAAs for education and/or training approval for VA benefit purposes is discussed in Chapter II. In Chapter IV, the approval and registration of apprenticeship and programs as used by the Bureau of

Apprenticeship and Training (BAT) staff is reviewed. The Accrediting Agency Evaluation Staff (AAES) process for recognizing accrediting agencies and associations is reviewed in Chapter V.

Methodology

The statistical data of the approval process for apprenticeship programs used by Department of Labor's (DOL) BAT staff will be compared with the statistical data of the apprenticeship and OJT programs approval process used by the SAA. Where possible, statistical data of the accrediting process used by the Department of Education's (DOE) AAES will be compared with the statistical data of the approval process used by the VA-SAA in approving an institute of higher learning (IHL) and non-college degree (NCD) schools or programs.

BACKGROUND

Forty years ago educational opportunities became available, through the GI Bill, to a massive sector of the population who otherwise might not have been able to receive formal education or training. In response to the availability of new monies made available through the GI Bill for education and training, schools opened throughout the Nation, some of them offering substandard programs. Congress developed the idea that education appropriately should be under the jurisdiction of the state, not the Federal, government. Laws were passed, implementing a system of checks and balances, to monitor education and training. States have established means for screening schools, developed systems for reviewing and making corrections through consumer complaint organizations, and implemented state licensing procedures. Congress enacted legislation which granted oversight authority to Federal agencies.

Local, state, and Federal agencies operate many programs and systems to insure that public funds are used for the purposes for which they were intended.

PURPOSE OF THE APPROVAL, REGISTRATION, AND RECOGNITION PROCESSES

The overall purpose of approving institutions, schools, programs, and curricula is to insure the public of quality, reputable education and to insure that public funds for education are not misspent.

AAES is responsible for the recognition of agencies whose primary purpose is to accredit institutions. BAT is responsible for the review and registration of individual apprenticeship training programs. ECOOS is responsible for the administration of reimbursement contracts with SAAs whose primary purpose is to approve and supervise individual education and training programs for veterans. The VA Education Services Unit in the regional office is responsible for education compliance and liaison activities with education institutions, training establishments, and SAAs at the local level.

One purpose of all three programs described in this evaluation is to protect the education benefits paid out of Federal funds.

Both the VA and the DOE have arrangements with external entities to work directly with the institutions which provide education and training. In the case of the VA, the SAAs approve and supervise education and training programs. Although the SAA is independently organized and administered by the states, its primary source of funding is Federal. The DOE uses private accrediting agencies, associations, and commissions to carry out visits and evaluations. The VA and DOE have staffs to insure that education institutions comply with existing laws, rules, and regulations as they relate to specific programs which receive Federal funds.

The DOL has an internal organization, Bureau of Apprenticeship and Training (BAT), which is responsible for coordinating and promoting apprenticeship programs. This bureau is responsible for determining whether or not apprenticeship training plans conform to industry standards.

SCOPE OF AUTHORITY

All three agencies (DOL, DOE, and VA) are concerned with programs nationwide. DOL's BAT program, which receives its authority from Public Law 89-554, targets apprenticeship programs. In fiscal year (FY) 1987, 294,519 trainees were served in 43,163 programs nationwide.

DOE, under Public Law 88-126, uses a core headquarters staff (AAES) to monitor accrediting agencies, associations, and commissions which evaluate schools and colleges nationwide. In FY 1987 there were 7,500 accredited schools and colleges. Currently 119 accrediting bodies have been authorized to monitor schools and colleges on behalf of the DOE.

VA has a program which includes the four types of training and education mentioned in earlier chapters, namely, apprenticeship (APP), on-the-job training (OJT), schools and colleges (IHL and NCD), and on a very modest scale, farm cooperative. In FY 1987 the VA, according to the survey respondents, had 225,388 trainees in 8,571 facilities or programs.

As Table VI-1 below indicates, DOL's BAT program has five to six times the number of programs or locations under its aegis as does either VA or DOE.

TABLE VI-1
NUMBER OF ACTIVE SITES/PROGRAMS, 1987

TYPE	DOL BAT	DOE AAES	VA & SAA
APP &/or OJT	43,163	--	1,973
IHL & NCD	--	7,500	6,598
TOTAL	43,163	7,500	8,571

RESOURCES

The headquarters staff of DOE's AAES and VA's Education Central Office Operations Staff (ECOOS) are somewhat parallel in function (see Chapters 2 and 5). The scope of authority for the ECOOS, however, is broader and the number of active programs and education and training sites under its jurisdiction is greater.

In interpreting Table VI-2, it should be noted that although BAT and SAA have a similar number of staff, the distribution and organizational relationships among offices is different for the two groups. For BAT, there is a hierarchal organization of regions, states, and areas; all staff are DOL employees. For SAA and VA there is a roughly one-to-one relationship between the 57 VA regional offices and the 72 SAA offices, and the two organizations perform different functions. The 180 SAA professionals report to 50 state governments, and the 53.5 (full-time equivalent) education liaison representatives (ELR) regional office professionals are VA employees.

TABLE VI-2
PROGRAM RESOURCES AND FEDERAL FUNDING, FY 1987
(in thousand dollars)

	DOL BAT	DOE AAES	VA ECOOS	VA & SAA
Staff (Full-time equivalent)	231	8	5.5	233.5
Number of Offices	92	1	1	129
Total Budget ($000)	13,029	317.1	229.6	11,017

APPROVAL COSTS

In the case of apprenticeship and OJT training, program development and monitoring are frequently at the individual trainee level. In contrast, school and college programs are reviewed at the course and program level. For this reason, the unit for comparison is different and is reviewed separately in the sections below.

Apprenticeship and On-The-Job Training

The BAT staff of 231 served 294,519 trainees in FY 1987; thus, on average, the number of trainees per staff person is 1,275. This works out to $44 for program approval per trainee based on the FY 1987 budget of $13,029,000.

There are an estimated equivalent 43 SAAs and 8 ELRs whose full-time duties are the approving of apprenticeship and OJT programs. The number of trainees in these programs in FY 1987 was reported to be 3,673; thus the number of trainees per SAA and ELR staff persons is 72. SAAs' operating costs for these program approvals in FY 1987 was $2,218,069, and the cost in FY 1987 for ELRs was $246,368 for a total of $2,464,437. According to these data, the VA spent about $671 for program approvals per apprenticeship or OJT trainee in FY 1987.

Schools and Colleges

The AAES is a staff of 8 with a budget of $317,130 in FY 1987. AAES does not keep statistics at the student or institution level, however in FY 1987, the program covered approximately 7,500 schools and colleges. The average Federal cost for each institution accredited by the accrediting bodies recognized by the AAES was $42 in FY 1987. However, the true cost of an accreditation includes the activities of the accrediting body and is primarily borne by the educational institution. These costs are not reflected in any of the figures presented in this chapter.

The ECOOS was a staff of 5.5 with a budget of $229,600 in 1987. The staff monitors 72 SAAs and programs at 8,571 education and training institutions. The average cost per institution for administering SAA contracts and program approvals for all types of programs was $27 in FY 1987. All costs are Federal costs.

Ten SAA professionals have full-time responsibility and an additional 159 SAA staff spend 80 percent of their time for approvals of Institutes of Higher Learning (IHL) and Non-College Degree schools (NCD). This equates to 137 full-time equivalent SAA professionals performing approvals of this type. In FY 1987 there were 6,598 programs or 48.2 programs per SAA professional. The apportioned share of the SAA budget authority for these approvals is $7,066,871. This equates to approximately $1,071 for each SAA program approval. The VA reported 219,958 trainees at IHLs and NCDs with an average-program-approval cost of $32 per trainee.

Additionally, the staff time of approximately 45.5 ELRs was spent for IHL and NCD approvals, averaging 145 programs per ELR, and with an FY 1987 salary cost for these ELRs of $1,472,881. Thus, the average cost per IHL or NCD program is $223. At the trainee level, the VA's program approval costs are $6.70 per IHL or NCD trainee.

The combined total cost to the VA for ECOOS, SAA, and ELR program activities is $8,769,000 which equates to about $1,329 per IHL or NCD approval or $40 per IHL or NCD trainee.

Table VI-3 consolidates the approval data of the three Federal agencies being compared. Using the annual authority or budget for each of these agencies, the number of programs each is responsible for and the number of trainees (where available) in each of the programs, a comparison of scope and related costs for each approval program emerges.

TABLE VI-3
AVERAGE FEDERAL COSTS FOR EDUCATION PROGRAM ADMINISTRATION, FY 1987

TYPE OF APPROVAL	DOL BAT	DOE AAES	VA ECOOS	VA & SAA
Apprenticeship & OJT				
Program Cost ($000)	13,029	--	combined	2,464
Staff (Full-time equivalent)	231	--	with	51
Number of Trainees	294,519	--	Schools/	3,673
Trainee/Staff Ratio	1,275	--	Colleges	72
Cost per Trainee($)	44	--	below	671
Schools and Colleges				
Program Cost ($000)	--	317.1		8,540
Professional Staff (FTEE)	--	6	4.5	182.5
Number of Agencies/Instit.	--	115*	72**	6,598***
Agencies or Instit./Staff Ratio	--	19.2	16.0	68.5
Cost per Unit ($)	--	2,758	3,189	1,294
Number of schools	--	7,500	8,571	6,598
Cost per Approved/ Accredited School ($)	--	42	27	1,294

*accrediting bodies (later 119) **SAAs ***active IHL/NCD sites

Comparisons that can be made from the data in Table VI-3 are that BAT serves 80 times more apprenticeship trainees than do the SAA and ELRs, and this number of trainees is being served by a staff to trainee ratio of 17.7 to 1. Although BAT has an operating budget 5.3 times greater than the SAA, the SAA cost per trainee is 15.3 times greater than the cost per trainee for BAT; however, the relationship of BAT to the apprentice and the SAA to the apprentice or OJT trainee is not equivalent. While apprenticeship programs is standardized, OJT is individualized. An OJT program may require an SAA professional to work directly with the owner of a small business to establish a unique training program.

Because the greater portion of the costs of accreditation are borne by the institution or school, a comparison of accrediting costs to approval costs cannot be made. The national recognition of an accrediting agency, commission, or association by AAES allows that body to accredit many IHLs and NCDs; likewise the ECOOS contract with the SAAs allows for multiple IHL and NCD approvals. AAES' review activities of accrediting bodies are of limited nature as they do not judge the evaluation standards of the accrediting bodies. On the other hand, the ECOOS, through the ELRs, routinely reviews the work of the SAAs to insure compliance with all VA education program regulations.

PROCESS

Comparative statistical data partially show the relative scope and cost of the approval/payment process. The data do not, however, define that process in terms of the complex mechanics involved. Table VI-4 lists the approval/payment phases, in broad descriptive statements, to show the processing similarities of the SAA, the AAES, and BAT. An 'X' in a column denotes that the activity is part of an organization's activities.

TABLE VI-4
COMPARISON OF EDUCATION PROGRAM APPROVAL/PAYMENT PROCESSES

ACTIVITY	DOL's BAT	DOE's AAES	VA's ECOOS	VA & SAA
Facility/Sponsor contacts Federal agency	X	X	X	X
Agency representative visits facility	X			X
Required documents sent to Federal agency	X	X	X	X
Federal agency reviews documents	X	X	X	X
Federal agency notifies all of approval	X	X	X	X
Facility/Sponsor sends student forms to VA	X			X
Confirmation of beneficiary/facility approval status	X	X	X	X
Award entered into system				X
Check generated for student				X
Review/evaluation/compliance visits	X			X
Deficiencies referred for correction	X			X
Federal agency notified of corrective action	X			X

While there are similar process activities performed by DOL, DOE, and VA, as indicated in Table VI-4, there are some activities which are not applicable to a specific Federal agency. For instance, the AAES is not directly involved with students and, therefore, would not have responsibility for student forms. Another example is the ECOOS' review of foreign schools. This review does not involve on-site visits; the processing of student forms is performed at the regional office level. Also, neither AAES nor BAT staffs become involved in granting or recording awards and have no involvement in generating a check for a student. Brief explanations of the broad descriptive statements used in Table VI-4 follow to clarify similarities and differences among the three Federal agencies.

Facility/Sponsor contacts Federal Agency

To initiate an action for education program approval, the facility, agency, or sponsor must contact the BAT, SAA, or the VA. An accrediting body which seeks national recognition must petition the AAES staff at the DOE. The contacted Federal agency provides information and instructions for making the required application.

Agency Representative Visits Facility

DOL and VA representatives visit educational facilities; DOE requires facility visit reports be included with petition for national recognition by accrediting bodies. Visits or visit reports are required to insure that the facility physically exists and that the facility is capable of carrying out its objectives.

Required Documents Sent to Federal Agency

DOL, DOE, and VA all require formal application from the facility, sponsor, or agency. The facility, sponsor, or agency must provide written application, supportive documents, and substantiating information in order for these Federal agencies to perform their evaluation and approval processes.

Federal Agency Reviews Documents

Each of the Federal agencies in this discussion have different criteria for processing applications. However, all three agencies have established specific guidelines for reviewing the documents submitted by an applicant and mandated methods for granting approval, registration, or national recognition.

Federal Agency Notifies All of Approval

In addition to the applicant's interest in being granted approval, there are other parties who require this information. All three Federal agencies discussed are responsible for notifying third parties.

Facility/Sponsor Sends Student Forms to VA

Where there are title 38 beneficiaries involved as students or trainees, the SAA, facility, sponsor, or BAT completes and sends the required forms to the VA. The AAES is not directly involved in student requests for Federal funds.

Confirmation of Beneficiary/Facility Approval Status

Third parties share an interest in an approval or accreditation. The DOE publishes a list of agencies and associations which have received national recognition. DOL provides lists of registered/approved apprenticeship and OJT programs. The VA provides confirmation of eligibility of a title 38 beneficiary and approval of the education or training program applied for.

Award Entered into System

The VA is the only one of the three Federal agencies in this discussion that deals directly with the financial award to the student. DOL and DOE do administer awards and grants to students, programs, and schools; however, the AAES and BAT are not directly involved in these activities.

Check Generated for Student

As stated in the previous category, only the VA is directly involved in assuring that a check is generated for the student.

Review/Evaluation/Compliance Visits

The VA, SAAs, and BAT are all actively involved in monitoring the facilities and programs which they have approved. The visits include reviewing records which the Federal agencies require the facility or sponsor to maintain, evaluating the progress of students, and monitoring the ongoing facility requirements for safety and equipment. AAES reviews each accrediting body at a minimum of once every four years; visits to the offices of the accrediting body by AAES staff is optional.

Deficiencies Referred for Correction

If a deficiency is revealed during a review/evaluation/compliance visit, the appropriate agency is notified. For example, DOL and VA have a specific requirement for the maintenance of student/trainee records. The records must include information about prior education or training, credit given the student at the time of enrollment, record of the students' ongoing progress, and projected date of program completion.

Federal Agency Notified of Corrective Action

After the corrective action is taken, the Federal agency is notified.

SUMMARY

The purpose for all three Federal agencies' programs described in this evaluation is to maintain the integrity of the education programs while insuring proper use of Federal funds.

In FY 1987, $24,592,519 in Federal funds were spent by DOE, DOL, and VA in pursuit of the stated purpose. In FY 1987, 478 employees were paid by the three agencies for this purpose.

The SAAs and VA reported a total of 8,571 education and training approval actions in FY 1987 requiring funds totalling approximately $11 million.

The DOL's BAT had developed and registered 43,163 apprenticeship programs by the end of FY 1987 with a budget of $13,029,000 for the fiscal year. This averages to $302 per program. By comparison, in FY 1987 the VA-SAA reported 3,673 apprenticeship and OJT approvals with a budget of $2,464,437 for an average cost per apprenticeship and OJT approval of $671.

The DOE's AAES, with an FY 1987 budget of $317,130, has enabled 7,500 institutions and schools to gain accreditation from a nationally-recognized accrediting body. The VA-SAA reports 8,571 education institutions offering approved programs in FY 1987 at an estimated cost of $11 million. The average total cost to the VA for each of these institutions equates to $1,280.

Accreditation is not the same as approval. DOE's AAES incurs costs for granting national recognition to accrediting bodies. AAES does not reimburse those accrediting bodies for the costs of accreditation. The VA-SAA costs for education program approval includes actual costs of approval as well as administrative costs. A major difference between the operations and philosophies of the VA and DOE's AAES is in the level of participation in the setting of standards for approval and in the monitoring of an institution for compliance. The VA participates closely in the education program approval process while DOE delegates the functions to the private accrediting bodies.

In addition to concern about the costs of approval and/or accreditations, there are process concerns. A comparison of the phases of the approval/accreditation process (Table VI-4), using twelve broadly descriptive statements, identified some similarities among the functions of two of the three Federal agencies. Both DOL's BAT and VA-SAA have authorized professionals performing, for example, site visits to insure that student records are maintained. The impact on the institution of having multiple outsiders performing like functions needs to be considered. It should also be considered that each agency has different mandated responsibilities. Legislation would be required to make changes to lessen the burden on the institution or establishment.

ANALYSIS OF THE EDUCATION PROGRAM APPROVAL PROCESS: A PROGRAM EVALUATION

VII. MODELS OF EXEMPLARY PRACTICES

PURPOSE

This chapter presents some of the innovations and creative solutions that State Approving Agency (SAA) and Veterans Administration (VA) education program approval professionals have developed in response to specific conditions that exist in their work environments. Because of the diversity of organizations across the nationwide system, it is not envisioned that these exemplary practices would be suitable for uniform application in each office; rather, it is hoped that these models will stimulate adaptations leading to improvements appropriate to each location.

APPROACH

The concept of program approval models became an evaluation objective as a result of discussions with National Association of State Approving Agencies (NASAA) officials. The data assembled here is intended to further the NASAA project of developing process approval models.

While visiting SAA and VA sites during the planning stage of the study, a variety of individual practices were observed that appeared to have applicability to numerous locales. To gather ideas from the entire VA-SAA education program approval community, respondents to the survey questionnaires were invited to submit ideas, computer programs, and forms to share with their colleagues.

Many of the responses were documents that had been designed to collect data from institutions. Another group of responses were instructions, fact sheets, and newsletters to institutions; in some states, reference manuals and/or formal procedural guidelines have been published to assist institutions in their application for education program approval and subsequent recordkeeping. A third type of response relates to work simplification practices and includes items such as forms developed to organize the work of the professionals as well as the use of word processors and/or computers to ease recordkeeping. The sections which follow are organized along these three functional lines and directly reflect the submissions from VA and SAA education program approval professionals; an additional section, Other Practices, is included to present ideas which do not readily fall into the preceding categories.

GATHERING INSTITUTIONAL DATA

The existing forms designed and distributed by the VA relate to the specific areas where the VA has responsibility. Five major data areas not addressed by VA forms are requests for program approval; amendments to approval and various notices; student records; training agreements; and other formal statements. Highlights from samples submitted by SAA and VA professionals are presented briefly under the headings below with reference to sources in parentheses. In a few cases the source of the submission was separated from the sample, the notation "identification lost" appears in parenthesis. A sizeable portion of forms reviewed had no identifying information or address printed on them.

Requests for Approval

- separate applications designed for every program variation (WV)
- colored paper used to distinguish type of program variation (ME, TX)
- brief requirements incorporated into application form (CO, ME, TX)
- instructions for distribution and return address very clear (AR, MO, NE)
- inclusion of physical plant (facility, safety, equipment) data (PR)
- adequate space for response (ME, NC)

Amendments to Approvals and Various Notices

- multi-copy forms with clear distribution instructions (CA-DAS, NJ)
- letterhead multi-copy computer forms (Seattle VARO)

Amendments to Approvals and Various Notices (continue)

- amendments to approval forms (MO)
- notice of disapproval or suspension (CA-DAS, WA-SBVE)

Student Records

- form designed for enrolled students (at course level) with multiple categories of student status (WA-SBVE)

Training Agreements

- inclusion of wage scale (AL, CO, MO, WV)
- start date and length of training provided (AR, OH)
- probationary period detailed (Seattle VARO)
- specification of vacation/holidays (AL)

Other Formal Statements

- notarized statement regarding advertising (OH)
- notarized statement regarding placement information (OH)

ASSISTING INSTITUTIONS

In January 1984, the American Association of Collegiate Registrars and Admissions Officers (AACRAO), in cooperation with the VA and the Department of Defense, published the fifth edition of their Certification of Students Under Veterans' Laws, a comprehensive guide to the laws, policies, and procedures governing the administration of providing educational assistance to eligible beneficiaries. During site visits, the study team became aware of this document because both VA and SAA professionals referred to this guide with respect. While there is no other group with an equivalent guide, the VA Vocational Rehabilitation and Education Service, working with AACRAO, is in the process of revising the AACRAO manual.

At the local level, both VA and SAA professionals have developed informational documents and/or packages to assist institutions in understanding the laws and regulations and to guide institutions in completing necessary paperwork. The submissions reviewed by the evaluation team can be grouped into factsheets and/or information sheets, standards and/or criteria, and instruction packages and/or guidelines; these are discussed in the paragraphs below.

Factsheets / Information Sheets

- "plain English" version of laws and regulations (IA)
- Spanish version of information packets (PR)
- summary of benefits available to veterans (NH, St. Petersburg VARO)
- periodic newsletter announcing changes in laws, regulations, or procedures (Roanoke VARO)
- excerpts from applicable laws and regulations (CO, MO, WA-SBVE)
- brochure for OJT eligibility (ME)
- color coded fact sheets for veterans and employers (ID)

Standards / Criteria

- published for each program type (ME, MO, TX)
- detailed examples for completing records and making calculations (WA-SBVE)

Instruction Packages / Guidebooks

- workbook guide with examples using fill-in-the-blanks approach (TX)
- manuals (ID, IN, NY, TX, WA-CPE)
- separate guides prepared for veterans and facilities (TN)
- pre-packaged application and information kits by program type (CA-SDE)
- record keeping requirements (Waco VARO)

WORK SIMPLIFICATION

In the spirit of sharing ideas which, when adapted to local conditions, can promote high professional standards and practices by streamlining routine activities, some VA and SAA professionals submitted checklists, visit report formats, and automated document systems. Features from these three categories of work simplification are presented below.

Checklists

The best of the checklists had the following features: clear identification of the purpose of the checklist, date of list development or last update, sufficient space for additional comments and narrative report, and a place for the person completing the checklist to sign and date the form. Few were color coded by program type. The checklists submitted served many purposes, among them were lists:

- o for supervisory visits (by program type) (CA-PPED)
- o for approvals (by program type) (ME, MO, NE, TX)
- o for office review of catalog/bulletin/handbook (IA, ME)
- o for visit preparation (identification lost)
- o for reviewing facility records (MO)
- o for office review of file completeness (CO)

Visit Reports

The features on the visit reports that impressed the study team as having possible value to other professionals included having headings on each page for listing the name and address of institution, purpose and funding for visit, date of current and previous visit, as well as the person(s) contacted. Having a summary (sometimes in checklist format) sheet on the visit report lessens the time for review and reserves the narrative portion for the noting of exceptions. One SAA included a "Check Prior to Visit" checklist which was particularly useful for training purposes. Some notable examples of features of visit reports are:

- o action to be taken is indicated (AR, CA-DIR,IA, PR)
- o signature block for facility representative (NH, IA, MN, WA-SBVE)

- clear separation of different types of review (policies, facility, records, etc.) (DC, IA, ME, MO, NJ, WA-SBVE)
- color coded by program type (AR, CA-DIR, ME, MN, NJ, Little Rock VARO)
- multipart forms color coded for distribution ease (CA-DIR, IA, OH)
- student record review form included (AR, NJ, PR)
- student interview guides (identification lost)

Automated Document Handling

Even in this era of automation, not all procedures benefit from computerization. However, there are a number of information sharing tasks that are part of the current interactive relationship between the VA and the SAA. Table II-6 in Chapter II summarizes the data processing equipment that exists currently in the SAA and the VA offices.

Many offices have used their word processing capabilities to eliminate the time-consuming tasks involved in producing routine letters which have identical format and are highly similar in content. Putting all approval data in the word processor allows approval revisions to be made expeditious. Ninety-five percent of the VA regional offices have the WANG system and, therefore, can readily transmit data to any other RO. For example, a veteran's VA Form 22-1990 can be transferred in a matter of minutes from one side of the country to the other.

A frustration that was expressed by a few VA respondents is that the automated system is not accepted by their VA Central Office counterparts; so they are now maintaining both a paper file and an automated file copy.

Some of the applications that are especially worthy of note are summarized below.

- automated system usage instructions included on form (Little Rock RO)
- VA Forms 22-1998a, -1998a-1, -1998b, -1998b-1 on WANG (Baltimore RO, Fargo RO, Louisville RO, Nashville RO)
- facility list with statistical data on IBM (WA-HECB)

- institutional catalog data on Lotus 1-2-3 for IBM (WA-HECB)
- visit schedules, master calendar & referrals (Huntington RO-dBase III program, Manchester RO, St. Louis RO, PA, TX, VA)
- Quarterly Problem School Report on WANG (Jackson RO)
- vouchers and audit trails on Lotus 1-2-3 (MD-DLI)

OTHER PRACTICES

Some of the suggestions, ideas, and practices which were offered by the survey respondents did not neatly fall into any of the previous functional categories; however, the concepts are appropriate for inclusion in this chapter. These remarks and/or ideas are listed below and are simply grouped by whether the idea originated from a VA or an SAA professional.

VA Professionals

- informal, handwritten notes or telephone referrals (Waco RO)
- education unit overview given to train adjudicators (New York RO)
- re-code VA's facility code to distinguish OJT and apprenticeship sites (Cleveland RO)
- workshops for certifying officials (FL)

SAA Professionals

- conferences and/or workshops (FL, ME)
- color coded buck slips to expedite requests (CA-SDE)
- sample official publication/catalog (CO, TX); Educational Assistance Program Information for school catalog (Veterans Section) (ME)
- student interview report (identification lost)
- SAA purpose and functions data sheet (MA-BRHE)
- new facility orientation (PR)
- copy of license to operate maintained in SAA file (PR)
- geographic-based visit schedule (NB-DE, OR-BLI)

- annual self-examination checklist for institution (UT-BR)
- reference to laws, rules, and regulations on documents to institutions (identification lost)

SUMMARY

There are a few practices which have elements that may be of interest to all or many education approval professionals. Some of the ideas have little cost associated with their implementation while others involve considerable expenditure of resources. The practices enumerated below cross several of the previously presented categories and include ideas drawn from earlier chapters.

Information Sharing

- The assurance that all data referring to the same institution is identical is critical to cooperative and effective assistance to veterans whether or not the data is transferred in an electronic medium. The avoidance of duplication of effort will save time and, ultimately, money for all parties involved.

- All purchases of telephone systems, word processing equipment, and computer hardware and software should be done in consultation with the corresponding office and the major education facilities in anticipation of electronic data sharing.

- NASAA needs to establish a clearinghouse of forms, computer programs, and other innovative solutions to administrative and procedural needs of the SAA offices to facilitate the exchange of effective practices. (NASAA is welcome to build upon the materials submitted for this report.) Both SAAs and ROs can request copies of documents referred to in this report by contacting the NASAA regional vice presidents or the authors of the report.

Training

- Responsibility for training must be undertaken systematically and, based on agreement, needs to be assigned to various organizational groups in the state so that all people involved in the process, even tangentially, get recurring opportunities to have timely training updates.

o Forms and documents can be designed to serve as self-instructional instruments to reinforce procedures for experienced professionals and as training materials for new or transfer employees.

Organizational Placement in State Government

Under existing legislation, the designation of one (or more) SAAs is the prerogative of the chief state official. However, the following points reflect the observations and conclusions of the study team.

o If there are multiple SAAs in a state, consideration should be given to merge the separate offices so that supervisory, clerical, computer, and administrative support can be shared.

o In the event of a state with a single SAA, consideration should be given to having a minimum of one full-time professional.

o Since the overwhelming majority of program users are enrolled in IHLs and, to a lesser degree, NCDs, the SAA profits from being closely allied to the postsecondary education establishment. Organizational placement of the SAA in the division of elementary education or vocational education division is inconsistent with the findings of this study.

o With the declining participation of veterans in apprenticeship and OJT training programs, the responsibility for these two types of approvals could reside with the SAA that has responsibility for IHL and NCD approvals. A method could be established for the SAA to access the experience and expertise of the state's division of Labor on a case-by-case basis for apprenticeship and OJT approval actions.

ANALYSIS OF THE EDUCATION PROGRAM APPROVAL PROCESS: A PROGRAM EVALUATION

VIII. SUMMARY

PURPOSE

This chapter summarizes the findings of the evaluation in a manner that highlights areas of concern as well as proposes remedies suggested by the VA and SAA professionals.

In addition to the benefit of increasing the awareness level and the understanding of the role of SAA and the VA partners in the education program approval process, several positive outcomes can result from this study: (1) streamline the existing procedures, (2) stimulate increased sharing of successful practices, and (3) use scarce Federal monies to their fullest potential.

FINDINGS

The evaluation's major findings are summarized below:

1. Veteran Students Primarily Attend Institutes of Higher Learning. Eighty-six percent of the beneficiaries of the GI Bill and the Montgomery GI Bill attend institutes of higher learning which include two- and four-year colleges, teachers colleges; hospital nursing, intern, and residency programs; and professional and technical institutions.

2. Placement of State Approving Agencies in State Organizations Varies. States have placed the function for education program approval for veteran students in a variety of places in the state bureaucracy. Of the 72 SAAs, 9 (or 12.5 percent) are in a state division (service, department, or commission) for veterans, 16 (or 22 percent) are part of the state labor establishment, and 47 (or 65 percent) are part of the state education establishment.

3. Funding of the State Approving Agency Function is Not Timely. SAAs operate based on a contract with the Federal government which is administered by the Veterans Administration. Officially, the Federal fiscal year begins on the first of October; ideally, contracts are in place and funds are available as of that date. As of January 15, 1988, contracts were still not in place. Uncertain funding threatens the effective operation of SAAs.

4. There Is Regional Variation in Education Program Approval Workload and Productivity. Not only the total number of approval/disapproval actions, but the actions per professional is highest in the Eastern SAA region.

5. Capability to Share Data Electronically is Not Used. Although more than 50 percent of the VA regional offices and SAAs have compatible data processing equipment, no coordinated computer usage plan has been devised which results in redundant effort and asynchronous files.

6. The Optimal Staff Size of SAA Office is Four Professionals. There are 15 states that have two SAA offices which are less than the optimal size of four professionals.

7. Department of Labor Approves and Registers Apprenticeship Programs Nationwide. The Department of Labor, through its Bureau of Apprenticeship and Training (BAT), approved 43,163 programs in which 294,519 trainees were enrolled in FY 1987. The apprenticeship programs approved for veterans nearly always have BAT's prior approval. There is a significant number of on-the-job training programs approved for veterans which do not come under the jurisdiction of BAT.

8. Department of Education Recognizes Accrediting Agencies Which Judge Quality of Educational Institution or Program. Accreditation of institutions by an agency or commission recognized by the Secretary of Education is a prerequisite for Federal financial assistance for programs supported by the Department of Education. Accreditation is not a prerequisite nor a guarantee of approval of programs for veterans' training. Roughly 95 percent of the IHLs and 72 percent of the NCDs with veteran beneficiaries enrolled are accredited.

APPROACHES TO IMPROVED PRACTICES

The current efforts of all the professionals involved in the approval of education and training programs for veterans are well-intentioned. Yet, the efforts of the VA and the SAA can appear non-focused when viewed by outsiders. For example, the myriad forms and reports and multiple visits to an apprenticeship facility by the Department of Labor (DOL), the State Approving Agency, and the Veterans Administration can be burdensome and may even be a disincentive to participate in the program. An analogous situation occurs at academic facilities where the accrediting agent replaces the DOL staff person.

There are a few practices which have elements that may be of interest to many or all education approval professionals. Some of the ideas have little cost associated with their implementation while others involve considerable expenditure of resources. The approaches enumerated below cross several of the previously presented categories and include ideas drawn from earlier chapters.

APPROACH: Concentrate Effort on Major Programs

o As described in Chapter II, a mere 1.6 percent of all the trainees were involved in apprenticeship and OJT programs in FY 1987; the remaining 98.4 percent of the trainees were enrolled in IHLs rather than NCD programs at the rate of nearly 15 to 1. Anecdotal data collected by the survey team supports the idea that most veterans now look for technical training within the more traditionally academic type of institutions so that veterans obtain an academic degree. This is be expected to continue with the bulk of Montgomery GI Bill participants enrolling in IHLs.

o Sixty-five percent of all SAA offices are organizationally placed in the education divisions of their states' structures, 22 percent are in the state labor departments, and 13 percent are in the state divisions for veteran affairs. Given the dimensions of program participation, there are few instances where placement within the labor department is appropriate.

APPROACH: Build on Existing Approvals

o The purpose for all three of the Federal agencies' programs described in this evaluation is to maintain the integrity of education programs while insuring proper use of Federal funds. The three Federal systems provide checks and balances to prevent substandard education or training. Providing funds for the multiple systems, if they perform similar functions, may not be appropriate during this era of fiscal restraint.

o Approvals performed by the SAA, in the case of accredited IHL and NCD programs and in the case of BAT-registered apprenticeship programs, should build on the prior review by one of these other agencies. If the VA were to accept those elements of accredited IHL/NCD programs and BAT-registered programs which are common to VA regulations, the SAA professionals could concentrate on those elements not previously reviewed and on providing the critical state liaison between the education facilities and the Federal agencies concerned with education issues. If the SAAs were to focus their approval of programs and to emphasize campus liaison work with trainees and institutional staff, the education approval function may serve the veteran students more efficiently.

o As concerned as VA professionals are about the issue of quality education, the approval process should not attempt to usurp the states' right to determine what constitutes quality. Where the SAA is an integral part of the state's postsecondary education department, the VA should forego attempts to assess what modes of delivery are appropriate for education programs.

APPROACH: Streamline Contract Renewal

o Current VA-SAA contract procedures call for contracts to be in place at the beginning of the Federal fiscal year, October first. However, the VA cannot allocate contract monies until the VA funding appropriations are enacted and the amount available for the SAA function is known. As of January 15, 1988, there was no contract in place for FY 1988.

o For many of the SAAs, the Federal fiscal year lags many months behind the state's fiscal year. Only 4.5 percent of the SAAs are in states which have October first as the beginning of the fiscal year; the majority (92 percent) of the SAAs are in states which begin their fiscal year on July first. Although most states have devised accounting methods to deal with the lag between the Federal and their state's fiscal calendar without having to place a moratorium on payments, the strategy can only work for a limited period of time. States cannot be expected to perform Federal functions without funding from the VA. A partial solution would be to write multi-year contracts or provide a one-year renewal option based on availability of funds.

o Both SAA and VA professionals recommend a schedule of supervisory visits that is dependent upon factors such as the type of institution and the number of veteran enrollees in the program. Rather than expect the SAAs to automatically conduct annual visits to education facilities, the SAAs could propose a calendar of visits with a travel budget request (the ELRs could concur or make amendments) prior to a contract being written.

APPROACH: Seize Training Opportunities

o Every time a participant in the veterans' education program gets a piece of paper from the VA or the SAA, there is an opportunity to teach the veteran or the education provider about the program; forms, letters, data sheets are but some of the media available. Documents can be designed with the object in mind to instruct the veteran or education provider and not to merely collect information necessary to the VA and the SAA.

o The communications departments of local colleges and the public television channels can be approached to prepare video presentations for use by campus veterans' counselors and to air public service announcements about the Montgomery GI Bill benefits: eligibility and application procedures.

o Veteran service groups can be approached as partners in sponsoring workshops to train school veterans' counselors and certifying officials.

o Responsibility for training of VA education service unit personnel, SAA staff, and school certifying officials needs to be assigned systematically and, based on agreement, needs to be assigned to various organizational groups in the state. For example, sixty-one percent of the VA professionals reported that they were self-taught.

APPROACH: Share Non-Restricted Data and Innovative Practices

- The assurance that all data referring to the same institution is identical is critical to insure cooperative and effective assistance to veterans. The avoidance of duplication of effort will save time, and ultimately money, for all parties involved.

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TABLE A-1
ACCREDITATION STATUS OF IHLs AND NCDs BY STATE, 1987

	------ IHLs -------			------ NCDs -------		
STATE	SITES*	Non-ACCREDITED		SITES*	Non-ACCREDITED	
		%	Number		%	Number
Alabama	102	2	2	55	5	3
Alaska	18	0	0	10	75	8
Arizona	54	2	1	64	5	3
Arkansas	50	8	4	56	67	38
California	395	13	52	185	29	53
Colorado	68	6	4	37	16	6
Connecticut	56	3	2	40	16	6
Delaware	16	0	0	8	5	0
Florida	138	6	8	134	16	21
Georgia	96	10	10	47	12	6
Hawaii	25	3	1	11	51	6
Idaho	15	9	1	14	49	7
Illinois	149	1	1	43	5	2
Indiana	85	0	0	36	50	18
Iowa	74	0	0	30	9	3
Kansas	58	2	1	37	3	1
Kentucky	76	1	1	62	23	14
Louisiana	44	0	0	89	17	15
Maine	37	0	0	21	29	6
Maryland	64	3	2	29	45	13
Massachusetts	125	0	0	51	25	13
Michigan	91	2	2	58	22	13
Minnesota	75	4	3	67	23	15
Mississippi	43	0	0	15	45	7
Missouri	120	10	12	96	12	12
Montana	19	22	4	11	42	5
Nebraska	45	10	5	22	37	8
Nevada	14	5	1	8	33	3
New Hampshire	41	4	2	15	5	1
New Jersey	69	2	1	51	2	1
New Mexico	29	5	1	11	25	3
New York	329	0	0	111	12	13
North Carolina	158	2	3	90	33	30
North Dakota	34	5	2	20	30	6
Ohio	173	14	24	90	24	22
Oklahoma	59	0	0	65	18	12
Oregon	51	2	1	19	35	7
Pennsylvania	236	7	17	120	27	32
Rhode Island	13	0	0	9	11	1
Puerto Rico	50	6	3	40	35	14
South Carolina	67	5	3	21	90	19
South Dakota	21	5	1	9	11	1
Tennessee	90	0	0	61	50	31
Texas	212	1	2	153	65	99
Utah	24	0	0	21	46	10
Vermont	18	0	0	2	0	0
Virginia	91	5	5	44	8	4
Washington	76	5	4	27	50	14
Washington, D.C.	41	2	1	23	35	8
West Virginia	39	10	4	32	5	2
Wisconsin	95	1	1	39	20	8
Wyoming	12	0	0	9	34	3
TOTAL	4,180		192	2,418		639

* Sites are active sites in FY 1987 as reported by the VAROs

TABLE A-2
GEOGRAPHICAL DENSITY AND WORKLOAD: VARO AND SAA OFFICES, 1987

	----- VARO ------			--------- SAA ---------		
STATE	#	ESUs	TRAINEES**	#	PROFESSIONALS*	SITES
Alabama	1	3.0	6,843	1	5.0	161
Alaska	1	2.0	926	1	1.0	83
Arizona	1	2.5	7,303	1	2.6	131
Arkansas	1	3.0	3,101	1	3.0	146
California	3	12.0	25,138	2	17.3	770
Colorado	1	2.0	4,234	1	3.0	149
Connecticut	1	2.0	1,107	1	2.0	96
Delaware	1	0.4	451	2	0.9*	26
Florida	1	5.0	12,271	1	5.3	257
Georgia	1	3.0	5,799	1	3.0	206
Hawaii	1	2.0	1,625	2	1.3	62
Idaho	1	1.4	1,589	1	1.0	41
Illinois	1	4.0	6,030	1	8.0	244
Indiana	1	2.3	3,218	2	4.3	151
Iowa	1	2.0	2,524	1	2.0	125
Kansas	1	2.0	2,526	1	2.0	104
Kentucky	1	2.0	3,656	1	1.0	206
Louisiana	1	3.0	4,544	2	1.0*	168
Maine	1	1.0	1,390	1	2.3	109
Maryland	1	2.0	3,758	2	2.5	148
Massachusetts	1	3.0	3,946	2	2.0*	228
Michigan	1	3.0	5,948	1	10.5	158
Minnesota	1	2.0	4,099	2	4.8	186
Mississippi	1	1.5	2,020	1	2.0	87
Missouri	1	4.0	5,705	1	3.0	265
Montana	1	1.0	1,016	1	1.0	30
Nebraska	1	2.0	1,535	2	2.0	84
Nevada	1	1.0	840	1	1.0	39
New Hampshire	1	2.0	713	1	1.5	78
New Jersey	1	3.0	1,648	2	5.3	201
New Mexico	1	1.0	1,719	1	1.0	62
New York	2	8.0	8,048	1	8.0	731
North Carolina	1	3.2	7,310	2	5.1	292
North Dakota	1	1.0	1,734	1	1.5	55
Ohio	1	5.0	10,051	2	4.5	263
Oklahoma	1	1.2	4,757	1	3.0	165
Oregon	1	2.0	1,942	2	2.8	213
Pennsylvania	2	6.5	5,586	1	10.0	523
Rhode Island	1	1.2	1,091	2	1.0*	37
Puerto Rico	1	2.0	2,435	2	1.5	149
South Carolina	1	3.0	3,370	1	3.8	265
South Dakota	1	1.3	1,239	1	1.0	74
Tennessee	1	2.0	4,077	1	5.0	198
Texas	2	8.0	21,578	1	8.8	435
Utah	1	2.0	2,110	2	0.8*	51
Vermont	1	1.0	301	2	2.3	516
Virginia	1	1.0	7,568	1	0.0*	179
Washington	1	3.0	5,970	2	4.0	175
Washington, D.C.	1	2.0	5,913***	1	0.8	48
West Virginia	1	2.0	1,283	2	3.0	101
Wisconsin	1	2.0	1,105	2	3.8	254
Wyoming	1	0.7	698	1	0.7	35
TOTAL	57	138.2	225,388**	72	174.0*	9,560

* partial response ** without ch 106 *** includes foreign & correspondence

EXHIBIT A-1
PERCEPTIONS OF VA AND SAA PROFESSIONALS

INSTRUCTION: Indicate the response that most clearly represents the degree to which you support the position stated.

"The ultimate purpose of the approval process (as provided for in the education provisions of the GI Bill) is to enable veteran students to become more employable."

	VA Respondents		SAA Respondents	
	NUMBER	PERCENT	NUMBER	PERCENT
o Strongly Disagree	5	8.8	4	6.1
o Disagree	3	5.3	6	9.1
o Agree	29	50.9	30	45.5
o Strongly Agree	19	33.3	24	36.4
o No Comment	1	1.8	2	3.0
o Total Responses	57	100.1%	66	100.1%

EXHIBIT A-1
PERCEPTIONS OF VA AND SAA PROFESSIONALS

INSTRUCTION: Indicate the response that most clearly represents the degree to which you support the position stated.

"Although the VA rules are cumbersome, the approval process helps to curb improper payments."

	VA Respondents		SAA Respondents	
	NUMBER	PERCENT	NUMBER	PERCENT
o Strongly Disagree	2	3.5	2	3.0
o Disagree	4	7.0	3	4.5
o Agree	35	61.4	38	57.6
o Strongly Agree	14	24.6	18	27.3
o No Comment	2	3.5	5	7.6
o Total Responses	57	100.0%	76	100.0%

EXHIBIT A-1
PERCEPTIONS OF VA AND SAA PROFESSIONALS

INSTRUCTION: Indicate the response that most clearly represents the degree to which you support the position stated.

"VA rules are so cumbersome, the approval process does not work in the best interest of the veteran student."

	VA Respondents		SAA Respondents	
	NUMBER	PERCENT	NUMBER	PERCENT
o Strongly Disagree	11	19.3	6	9.1
o Disagree	30	52.6	17	25.8
o Agree	11	19.3	25	37.9
o Strongly Agree	5	8.8	17	25.8
o No Comment	--	--	1	1.5
o Total Responses	57	100.0%	66	100.1%

EXHIBIT A-1
PERCEPTIONS OF VA AND SAA PROFESSIONALS

INSTRUCTION: Indicate the response that most clearly represents the degree to which you support the position stated.

"Paperwork is only a small portion of the work of a conscientious SAA professional."

	VA Respondents		SAA Respondents	
	NUMBER	PERCENT	NUMBER	PERCENT
o Strongly Disagree	2	3.5	6	9.1
o Disagree	14	24.6	17	25.8
o Agree	22	38.6	25	37.9
o Strongly Agree	17	29.8	17	25.8
o No Comment	2	3.5	1	1.5
o Total Responses	57	100.0%	66	100.1%

EXHIBIT A-1
PERCEPTIONS OF VA AND SAA PROFESSIONALS

INSTRUCTION: Indicate the response that most clearly represents the degree to which you support the position stated.

"There is so much state and federal 'red tape' that VA requests for SAA action are not handled in a timely manner."

	VA Respondents		SAA Respondents	
	NUMBER	PERCENT	NUMBER	PERCENT
o Strongly Disagree	12	21.1	23	34.8
o Disagree	38	66.7	34	51.5
o Agree	3	5.2	3	4.5
o Strongly Agree	3	5.2	2	3.0
o No Comment	1	1.8	4	6.1
o Total Responses	57	100.0%	66	99.9%

EXHIBIT A-1
PERCEPTIONS OF VA AND SAA PROFESSIONALS

INSTRUCTION: Indicate the response that most clearly represents the degree to which you support the position stated.

"Assurance that a veteran is enrolled in a quality education/training program is not contingent on the approval function."

	VA Respondents		SAA Respondents	
	NUMBER	PERCENT	NUMBER	PERCENT
o Strongly Disagree	9	15.8	29	43.9
o Disagree	16	28.1	20	30.3
o Agree	15	26.3	9	13.6
o Strongly Agree	16	28.1	3	4.5
o No Comment	1	1.8	5	7.6
o Total Responses	57	100.1%	66	99.9%

EXHIBIT A-1

PERCEPTIONS OF VA AND SAA PROFESSIONALS

INSTRUCTION: Indicate the response that most clearly represents the degree to which you support the position stated.

"VA regulations do not keep up with the education trends in the state."

	VA Respondents		SAA Respondents	
	NUMBER	PERCENT	NUMBER	PERCENT
o Strongly Disagree	1	1.8	2	3.0
o Disagree	14	24.6	22	33.3
o Agree	28	49.1	30	45.5
o Strongly Agree	10	17.5	7	10.6
o No Comment	4	7.0	5	7.6
o Total Responses	57	100.0%	66	100.0%

EXHIBIT A-1
PERCEPTIONS OF VA AND SAA PROFESSIONALS

INSTRUCTION: Indicate the response that most clearly represents the degree to which you support the position stated.

"If the VA-SAA did not require attendance records, most NCDs, APP, and OJT facilities would maintain such records."

	VA Respondents		SAA Respondents	
	NUMBER	PERCENT	NUMBER	PERCENT
o Strongly Disagree	8	14.0	9	13.6
o Disagree	23	40.4	24	36.4
o Agree	15	26.3	21	31.8
o Strongly Agree	11	19.3	9	13.6
o No Comment	--	--	3	4.5
o Total Responses	57	100.0%	66	99.9%

TABLE B-1

REGIONS OF THE NATIONAL ASSOCIATION OF STATE APPROVING AGENCIES

(Exceptions to One Agency per State Shown by Bracketed Number)

SOUTHERN

Alabama
Arkansas
Florida
Georgia
Kentucky
Louisana (2)
Mississippi
North Carolina (2)
Oklahoma
Puerto Rico (2)
South Carolina
Tennessee
Texas
Virginia

CENTRAL REGION

Illinois
Indiana (2)
Iowa
Kansas
Michigan
Minnesota (2)
Missouri
Nebraska (2)
North Dakota
Ohio (2)
South Dakota
Wisconsin (2)

WESTERN REGION

Alaska
Arizona
California (2)
Colorado
Hawaii (2)
Idaho
Montana
Nevada
New Mexico
Oregon (2)
Utah (2)
Washington (2)
Wyoming

EASTERN REGION

Connecticut
Delaware (2)
Maine
Maryland (2)
Massachusetts (2)
New Hampshire
New Jersey (2)
New York
Pennsylvania
Rhode Island (2)
Vermont (2)
Washington, D.C.
West Virginia (2)

TABLE C-1

REGIONS OF DOL's BUREAU OF APPRENTICESHIP AND TRAINING INCLUDING NUMBER OF TRAINEES AND PROGRAMS SERVED, 1987

REGION		STATES SERVED
Region I,	Boston, MA 20,827 Trainees 9,419 Programs	Connecticut, New Hampshire, Maine, Rhode Island, Massachusetts, Vermont
Region II,	New York, NY 32,863 Trainees 5,827 Programs	New Jersey, Puerto Rico, New York, Virgin Islands
Region III,	Philadelphia, PA 30,527 Trainees 6,028 Programs	Delaware, Virginia, Maryland, West Virginia, Pennsylvania
Region IV,	Atlanta, GA 22,359 Trainees 2,744 Programs	Alabama, Mississippi, Florida, North Carolina, Georgia, South Carolina, Kentucky, Tennessee
Region V,	Chicago, IL 47,268 Trainees 11,398 Programs	Illinois, Minnesota, Indiana, Ohio, Michigan, Wisconsin
Region VI,	Dallas, TX 15,675 Trainees 1,188 Programs	Arkansas, Oklahoma, Louisiana, Texas, New Mexico
Region VII,	Kansas City, MO 11,466 Trainees 1,829 Programs	Iowa, Missouri, Kansas, Nebraska

Region VIII,	Denver, CO 4,547 Trainees 1,432 Programs	Colorado, South Dakota, Montana, Utah, North Dakota, Wyoming
Region IX,	San Francisco, CA 47,540 Trainees 1,873 Programs	Arizona, Hawaii, California, Nevada
Region X,	Seattle, WA 10,189 Trainees 1,402 Programs	Alaska, Oregon, Idaho, Washington

EXHIBIT C-1

TITLE 29, SECTION 50b: LABOR STANDARDS FOR REGISTRATION OF APPRENTICESHIP PROGRAMS

An apprenticeship program, to be eligible for registration/approval by a registration/approval agency, shall conform to the following standards:

1. The employment and training of an apprentice must be in a skilled trade.
2. The term of apprenticeship training must not be less than 2,000 hours of work experience.*
3. The apprentice will receive supervised work experience and training on the job as outlined in the work process plan.
4. A minimum of 144 hours per year of supplemental instruction in technical subjects related to the trade will be provided the apprentice.*
5. A schedule of progressively increasing wages which are to be paid the apprentice must be consistent with the skill acquired.
6. Periodic review and evaluation will be made of the apprentice's progress in job performance and related instruction. Appropriate progress records will be maintained and be included in the review.
7. There must be numeric ratio of apprentices to journeymen consistent with proper supervision, training, safety, and continuity of employment.
8. Provisions for a probationary period reasonable in relation to the full apprenticeship term, with full credit given for such period toward completion of apprenticeship.
9. There must be adequate and safe equipment and facilities for training and supervision, and safety training for apprentices on the job and in related instruction.
10. Establish minimum qualifications required by a sponsor for persons entering the apprenticeship program, with an eligible starting age not less than 16 years.
11. Appropriate job placement of an apprentice under a written apprenticeship agreement.

* Indicates standards which do not apply to OJT programs.

12. Sponsor agrees to the granting of advanced standing or credit for previously acquired experience, training, or skills for all applicants equally, with commensurate wages for any progression step so granted.

13. Insure transfer of employer's training obligation when the employer is unable to fulfill his obligation under the apprenticeship agreement to another employer under the same program with consent of the apprentice and apprenticeship committee or program sponsor.

14. Assurance of qualified training personnel and adequate supervision on the job.

15. Method for granting recognition for successful completion of apprenticeship evidenced by an appropriate certificate.

16. Identification of the registration agency.

17. Provide a provision for the registration, cancellation and deregistration of the program and requirement for the prompt submission of any modification or amendment.

18. Establish a provision for registration of apprenticeship agreements, modifications, and amendments; notice to the registration office of persons who have successfully completed apprenticeship programs; and notice of cancellations, suspensions and terminations of apprenticeship agreements and causes.

19. Grant authority for the termination of an apprenticeship agreement during the probationary period by either party without stated causes.

20. Provide a statement that the program will be conducted, operated and administered in conformity with applicable provisions of State EEO requirement.

21. Provide the name and address of the appropriate authority under the program to receive, process and make disposition of complaints.

22. Establish a method for recording and maintenance of all records concerning apprenticeship as may be required by the Bureau (BAT) or recognized State Apprenticeship Agency and other applicable law.

EXHIBIT C-2

DEFINITION OF DOL TERMS

In the discussion of Chapter IV, the terms apprentice, apprenticeship program, sponsor, and apprenticeship committee are used in setting forth the DOL criteria for program approval. Therefore, these terms are used as defined by the Secretary of Labor.

Apprentice is a worker at least 16 years of age, except where otherwise fixed by law, who is employed to learn a skilled trade under standards of apprenticeship.

Apprenticeship program is an organized, written plan containing the terms and conditions of employment, training, and supervision of apprentice(s) in the apprenticeable occupation, and agreed to by a sponsor who has undertaken to carry out the apprentice training program.

Sponsor is any person, association, committee, or organization operating an apprenticeship program and in whose name the program is registered and/or approved.

Apprenticeship committee are those persons designated by the sponsor to act for it in the administration of the program. A joint committee may be composed of an equal number of representatives of the employer(s) and of the employees represented by a union agent(s). A non-joint committee means a program sponsor in which the employees represent themselves (no union agent).

Apprenticeable occupation is a skilled trade which is customarily learned in a practical way through a structured, systematic program of on-the-job supervised training. The occupation is clearly identified and commonly recognized throughout an industry. It involves manual, mechanical, or technical skills and knowledge which require a minimum of 2,000 hours of on-the-job work experience and supplemental related instruction.

Apprenticeship Agreement is a written agreement between the apprentice and the apprenticeship program sponsor, which contains the terms and conditions of the employment and training of the apprentice.

TABLE D-1

REGIONAL INSTITUTIONAL ACCREDITING ASSOCIATIONS AND COMMISSIONS

NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES: (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont)

- o Commission on Independent Schools
- o Commission on Institutions of Higher Education
- o Commission on Public Schools
- o Commission on Vocational Technical, Career Institutions

SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS: (Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, Virginia)

- o Commission on Colleges
- o Commission on Occupational Education Institutions

NORTHWEST ASSOCIATION OF SCHOOLS AND COLLEGES: (Alaska, Idaho, Montana, Nevada, Oregon, Utah, Washington)

- o Commission on Colleges

NORTH CENTRAL ASSOCIATION OF COLLEGES AND SCHOOLS: (Arizona, Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin, Wyoming)

- o Commission on Institutions of Higher Education
- o Commission on Schools

WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES: (California, Hawaii, Guam and other areas of the Pacific)

- o Accrediting Commission for Community and Junior Colleges
- o Accrediting Commission for Schools
- o Accrediting Commission for Senior Colleges and Universities

MIDDLE STATES ASSOCIATION OF COLLEGES AND SCHOOLS: (Delaware, District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, Virgin Islands)

- o Commission on Higher Education

TABLE E-1
FORMAL EDUCATION OF VA and SAA PROFESSIONALS

	AVERAGE YEARS	STD DEV
VA Educ Liaison Reps	15.8	2.0
SAA Professionals	17.2	2.2

See Table II-12 in Chapter 2.

TABLE E-2
APPROVAL ACTIVITIES PERFORMED BY SAA PROFESSIONALS

ACTIVITIES	PERCENT OF TIME	STD DEV
Supervisory Visits	22.3	12.7
Approvals/Disapprovals	15.4	9.9
Catalog Review	13.0	7.6
Traveling to and from Sites	12.2	7.6
Inspection Visits	12.1	15.6
New Program Development (APP, OJT, Farm)	8.6	6.9
Review of Previously Approved Programs	7.3	4.1
Keeping Statistics for the VA	5.8	5.8
Visits at the Request of the VA	4.3	3.2
Information/Outreach Activities	4.2	3.5
Meeting/Discussing Concerns with the VA	4.2	2.8
Advising/Consulting with Other State Agents	3.9	2.4
Other VA-related Activities	4.2	3.5
Other non-VA Activities	7.3	9.4

See Table II-15 in Chapter 2.

TABLE E-3
AVERAGE SALARIES OF VA and SAA PROFESSIONALS

	AVERAGE SALARY	STD DEV
VA Educ Liaison Reps	$32,371	1,842
SAA Professionals	$35,880	9,024

TABLE E-4
TIME FOR SELECTED VA ACTIVITIES BY TYPE OF INSTITUTION
(in hours)

ACTIVITY	MEAN			STD DEV		
	IHL	NCD	APP/OJT	IHL	NCD	APP/OJT
ESU Reviews Documents	2.3	2.6	1.4	3.1	4.1	2.5
ESU Notification of Approval	4.1	4.1	2.1	10.6	10.6	3.2
ESU Conducts Compliance Survey	15.0	14.0	6.9	21.1	21.1	15.6
ESU Refers Deficiencies to SAA	9.8	9.8	6.4	24.2	24.1	15.2

See Table III-1 in Chapter 3.

TABLE E-5
TIME FOR SELECTED SAA ACTIVITIES BY TYPE OF INSTITUTION
(in hours)

ACTIVITY	MEAN			STD DEV		
	IHL	NCD	APP/OJT	IHL	NCD	APP/OJT
Initial Visit to Facility	6.0	5.8	5.8	12.4	12.3	15.4
Document Prep & Forwarding	7.0	7.1	5.3	8.9	9.1	9.2
Annual Supervisory Visit	6.1	5.5	4.5	11.3	11.2	14.1
Notify VA of Corrective Actions	7.8	8.6	8.4	15.8	16.8	17.7

See Table III-2 in Chapter 3.

TABLE E-6
TIME BETWEEN SELECTED ACTIVITIES BY TYPE OF INSTITUTION
(in workdays)

ACTIVITY	MEAN			STD DEV		
	IHL	NCD	APP/OJT	IHL	NCD	APP/OJT
VA:						
Between Phase 3 & Phase 4	9.8	9.5	6.3	10.4	9.6	7.0
Between Phase 3 & Phase 5	15.7	15.3	10.3	13.3	12.6	10.3
Between Phase 3 & Phase 9	45.3	48.7	44.9	20.3	22.8	23.4
Between Phase 6 & Phase 7	14.6	15.6	14.0	11.3	11.9	10.9
Between Phase 6 & Phase 9	29.8	33.1	31.3	10.7	14.7	13.9
Between Phase 12 & Phase 13	33.1	34.1	30.7	19.9	20.4	19.7
SAA:						
Between Phase 1 & Phase 3	22.3	22.8	20.1	14.9	14.3	14.3
Between Phase 3 & Phase 9	47.5	49.1	41.6	29.2	29.6	24.5
Between Phase 12 & Phase 13	25.1	24.9	23.5	13.5	13.5	14.5

See Table III-3 in Chapter 3.